



2 May 2014

Yarra Climate Action Now (YCAN) wishes to make a submission regarding the East West Link (EW Link) Comprehensive Impact Statement (CIS). YCAN is a community group of volunteers who are actively concerned about issues of climate change and sustainability in the City of Yarra and beyond. As such we feel that the proposed EW Link will have disastrous impacts on environmental pollution, and detrimental impacts on the liveability and sustainability of Yarra and the City of Melbourne.

Our comments refer mainly to Precincts 1 and 2.

1. **Transport connectivity**

- The whole premise of the EW Link is flawed. It is based on the acceptance of the necessity of a huge toll road. We contest the claim that this project will “reduce through traffic on surface roads in Melbourne’s inner north” (CIS p.36). Based on the experience of other similar-sized road projects, we believe that construction of the EW Link will only increase motor vehicle traffic.
- The CIS is correct in describing the project area in the following statement: “The area has the highest rate of bicycle use in the metropolitan area and a very high rate of walking to work. Car ownership is also very low, with 29% of households having no cars” (CIS p.19). Developing this project will have a prejudicial effect on pedestrian and bicycle amenity, rather than enhancing the possibilities for increased foot and cycle traffic. Therefore the development of the EW Link will have a negative impact on the communities that it will pass through, both during construction and after the project is finished.
- Connectivity benefits are primarily for large commercial interests, not for residents and local businesses. There is not benefit whatsoever to the significant 29% of households who do not own cars.
- Existing pedestrian and bicycle connectivity will be disrupted during construction, and the proposals for mitigation of these impacts are extremely vague. What provision has been made for bicycle and pedestrian traffic from Collingwood/Abbotsford to Clifton Hill/Fitzroy? The CIS gives us no information.
- Cycling and walking culture leads to better general health from increased exercise and cleaner air. Encouraging car usage does not.

- As we know from previous tolled road projects, toll avoidance leads to rat-running which is already a significant problem in the City of Yarra.
- Public transport usage is part of social connectivity in the inner suburbs, increasing sustainability, liveability and general wellbeing. Building freeways encourages individual car use, thus detracting from the above factors.
- The proposal has no provision for the successful “smart bus” lanes.
- Governments should be encouraging and facilitating the spread of public transport in areas that are poorly served eg Whitehorse, Manningham, Wyndham etc. The massive cost of the EW Link project will swallow all transport funding for decades, precluding any and all public transport development.
- The loss of the median strip on the Eastern Freeway east of Hoddle St precludes the future construction of the long promised Doncaster Rail.

2. Land use, dwellings and infrastructure

- The impacts on residential properties and businesses that will face flyovers and new freeway routes, with greatly reduced amenity and without compensation, have been ignored.
- Public open space such as Royal Park, Yarra Bend National Park and reserves along Moonee Ponds Creek are irreplaceable. The large-scale removal of mature trees and the removal of wetlands and open space in Royal Park, on the Merri Creek, are unacceptable in terms of destruction of native vegetation and habitat, as well as biodiversity loss.
- The loss of sports grounds and passive recreation space will have a negative impact on community health and well being across inner Melbourne.
- Access to the historic and important Fitzroy Pool will be restricted, particularly for the elderly and children.
- There will be adverse health impacts on the elderly and young, particularly with the proximity of the construction and future usage of the EW Link to the Gold Street Primary School and nearby Sambell Lodge, the Brotherhood of St Laurence’s aged-care accommodation which caters for elderly people with special needs.
- Putting heavy freight into a high density, inner urban area, particularly when combined with the loss of open space and trees that help absorb carbon emissions, is a major concern.
- 24-hour construction will cause noise and pollution without respite.
- Tunneling and heavy traffic during construction may damage houses.
- Where will the proposed 3000 employees who use car transport park? Many residents have no off-street parking and struggle to find on-street parking for their own cars.

3. Visual amenity

- A major road-building project of this scale bisecting a municipality will have huge negative visual impacts, particularly on the character of some of Melbourne’s oldest suburbs.
- Widened roads, tunnel entries and exits, flyovers and sound barriers will damage the historic architectural and landscape identity of the City of Yarra. The design and height of the structurally unnecessary “gateway” feature of the proposed Hoddle Street flyover will completely dominate the area. This demonstrates a total ignorance of the cultural and heritage values of the area.

- The EW Link will ruin the unique view of the historic shot tower on Alexandra Parade.
- The vent stack will also dominate its low-rise surroundings.

4. Noise, vibration, air emissions and light spill

- The CIS refers only to localised air quality reduction during construction (*Eastern Section Scoping Directions for CIS* p. 8). As reported in the federal government's *Green Vehicle's Guide* (<http://www.greenvehicleguide.gov.au/gvgpublicui/Information.aspx?type=VehicleEmissions>) there are "two major concerns associated with car exhaust emissions". One is that they contribute to urban air pollution with the emission of carbon monoxide, nitrogen oxide etc. The other is the emission of the greenhouse gases carbon dioxide and methane, which as is stated on this government website "contribute to climate change". The CIS has glossed over ongoing local air pollution issues post-construction, and it has completely ignored the long-term impacts of increased greenhouse gas emissions, which will add to the nation's already unacceptable greenhouse footprint. As the *Green Vehicle Guide* states, motor vehicle emissions were responsible for 13.2% of Australia's greenhouse emissions in 2009, and continue to increase.
- Proposed mitigation responses will never prevent a further increase in greenhouse emissions from cars using the E W link in the future.
- There will be a permanent increase in traffic noise along the entire route. The height of flyovers will result in traffic noise affecting a wider area than the immediate surroundings.
- Extensive lighting of a freeway requires electricity generation, particularly in tunnels where lights are required 24-hours a day. This will be responsible for further greenhouse gas production. This is a particular issue in Victoria where most electricity continues to be sourced from polluting, unsustainable brown coal generators.

5. Cultural heritage

- The cultural heritage of the City of Yarra will be irreparably damaged if this proposal proceeds. The enormity of the project will not only be a visual eyesore, but will alter the unique lifestyle of a close-knit community where access to small shops and community facilities are easily and regularly accessed by foot or bicycle.
- Pocket parks, laneways, footpath vegetable gardens all contribute to the liveability of Yarra, and we have grave fears that this will be lost because of noise, pollution, rat-running and the ugliness of flyovers and other structures.
- The historic shot tower on Alexandra Parade is at risk of physical damage due to digging and vibrations.

6. Surface water and groundwater

- The CIS does not appropriately address the impacts of groundwater contamination on the health of residents in the surrounding areas.
- The effects of damming and dewatering on built structures have not been addressed.
- The parks and waterways that will be impacted by this proposal are precious resources for Melbourne, and are dependent on an adequate supply of uncontaminated water.

7. Native vegetation and biodiversity

- Royal Park, Yarra Bend Park, Moonee Ponds Creek and Merri Creek will all be damaged, or minimised by the proposal. Removing any vegetation decreases wildlife habitation and hinders flight and travel corridors for birds and other wildlife.
- Trees are essential for mitigating the effects of carbon pollution; removing trees simultaneously with increasing motor vehicle emissions makes no sense.

8. Solid wastes

- We are concerned that the CIS does not provide adequate explanation of the nature and extent of the earthworks of this project.
- The CIS does not deal convincingly with issues of contamination, or storage of contaminated soil removed.

9. Environmental management framework

- No amount of management, monitoring or mitigation will correct the environmental disaster of this proposal. It is premised on alleviating difficulties for motor vehicle traffic, particularly freight carrying trucks, with the result that rather than persuading and facilitating the community to reduce car use, EW Link will encourage it.
- Attempts such as that of EW Link to facilitate increased car use can only encourage Melbourne's already out-of-control urban sprawl, with its completely inadequate public transport provisions.

Conclusion

YCAN has been, and remains, extremely concerned about both this proposal and its process. It appears obvious that this process has been designed to preclude our deepest concerns from being addressed. The public information sessions provided little information. Affected residents were virtually excluded from relevant advice and have been treated with contempt.

According to the article in *The Age* on 9 December entitled "Secret report on east-west link reveals traffic explosion", this project will increase the number of cars in the road. "The east-west link will trigger huge increases in traffic on key sections of Melbourne's road network, with parts of Hoddle Street and the Liberal stronghold of Kew among the worst hit." The EW Link will have the most direct and negative impact on residents of Yarra who will receive the least benefit from it.

The CIS consultation process is undemocratic with the majority of our objections lying outside its terms of reference. The Victorian government and the Linking Melbourne Authority have decided that the EW Link is a given, with any problems addressed and dismissed by "performance management". The fact that existing experience and evidence continue to demonstrate that building more massive road systems in urban areas does not solve traffic problems, and in fact exacerbates them, has been completely ignored.

Cities worldwide, even previously car-centric US metropolises such as Detroit and Los Angeles, recognise that promoting public transport, cycling and walking is essential in helping the planet tackle climate change. These cities are among those around the world who are closing down parts of their freeway networks and spending public money on public transport and bicycle infrastructure.

Melbourne is being dragged backwards by this out-dated and irresponsible plan.