



victorian**transport**association inc.

West Gate Tunnel Project:

Response to Environment Effects Statement

**Submission on behalf of the
Victorian Transport Association**

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Submitted by:
Peter Anderson – Chief Executive Officer
Victorian Transport Association
Level 1, Mirrat House
46 Koorringa Way
Port Melbourne VIC 3207
Telephone: (03) 9646 8590
Email: peter@vta.com.au



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1.0 ABOUT THE VICTORIAN TRANSPORT ASSOCIATION (VTA)

1.1 Introduction

The Victorian Transport Association (VTA) has over 800 members and is dedicated to the service of members and supporters in all sectors of the transport and logistics industry.

With over 100 years' experience and a specific business focus, we possess the industry acumen, market knowledge and industry contacts that enable members to capitalise on the current commercial and regulatory environments.

Recognised as Australia's pre-eminent multimodal prime contractor and employer organisation in transport and logistics, the association works with all levels of government, the unions, statutory authorities and the industry to achieve mutually beneficial outcomes. The VTA is committed to enhancing the image of the industry while helping improving the commercial environment for our members to operate.

1.2 Representation & Services

The VTA represents the industry through a variety of means and provides major services to its members and industry.

The VTA also has the experience and expertise to provide valuable information, advice and programs for:

- Industry Regulations and Compliance
- Industrial Relations
- Education & Training

2.0 RESPONSE TO THE ENVIRONMENT EFFECTS STATEMENT (EES)

2.1 Background

The Victorian Transport Association (VTA) has made a strategic assessment of the merits of the Environmental Effects Statement (EES) of the West Gate Tunnel Project (the Project), and has determined that this Project will deliver a high level of benefit in providing an alternative to the West Gate Bridge and supporting the productivity and performance of the Monash/CityLink/West Gate Freeway (M1 corridor).

There has been due consideration given to both the needs of community amenity and the commercial requirements of the infrastructure demands. It is important to note that while the Project will assist in improving transport connections with the city and the western and inner western suburbs, the need for the Port of Melbourne (PoM) to grow and prosper is vital to the overall prosperity of the state of Victoria and this Project must deliver on Melbourne's future growth opportunities.



The VTA maintains that there are a number of key issues which need to be included in the Project and require further discussion, consultation and direction. The VTA has prepared a number of recommendations for consideration as they would assist more efficient movement of freight through the West Gate Tunnel System.

2.2 VTA's approach to the Submission

The VTA acknowledges the extensive amount of work involved in the preparation and collation of the associated documentation for this Project. The VTA also recognises that the Project has three key components:

- the West Gate Freeway component
- the Tunnels component
- the Port, CityLink and city connections component

Given the purpose of this submission, the VTA has adopted the above mentioned components as the framework upon which to base its response. The VTA has included its specific recommendations under each of these three headings.

The VTA also recognises the EES is not an approval process in itself and that it also evaluates the environmental effects of the Project as presented in the Project design. This submission to the VTA does not focus on the environmental aspects but acknowledges the importance of ensuring that the Project will be delivered in accordance with a set of Environmental Performance Requirements (EPRs) that prescribe the environmental objectives and required outcomes.

3.0 VTA RESPONSES TO THE THREE COMPONENTS OF THE (EES)

Each of the three components contain the VTA response and recommendations.

3.1 West Gate Freeway Component

3.1.1 Tolling Regime

It is important to note that the Tolling regime for light and heavy freight vehicles has no detail in the EES. It is the position of the VTA that all Tolls should reflect the net impact upon the infrastructure in a fair and equitable way.

The VTA is very aware and concerned that this has certainly not been the case for the transport and logistics industry in recent years as demonstrated by the current tolling regime. It is extremely important we achieve the 'right' balance with this Project.



The VTA cannot over-emphasise the importance of a fair, equitable and flexible tolling regime being implemented and what the transport and logistics industry makes to the national economy cannot and should not be under-estimated.

The VTA would like to make a number of recommendations that would see the transport industry better served by the Tolls combined with the efficiency this project will bring to the industry.

Recommendation 1

The tolling regime should acknowledge the multiple user and shuttle service providers to the PoM at an agreed threshold of daily movement. The transport operator should be eligible for a discount on the current tolling rates that would encourage full usage of the system. The parameters of this scheme are to be determined.

Recommendation 2

Additional heavy vehicle classifications should be installed that encompass the inclusion of High Productivity Freight Vehicles (HPFV).

3.1.2 Grieve Parade Interchange

'The entry ramp to the eastbound carriageway would be realigned, widened and extended to accommodate the three-lane ramp meter required (two general traffic lanes and one truck priority lane)'. (EES)

The VTA is pleased that the entry points to the entry ramp will be enhanced and include smoother access for heavy vehicles.

The VTA does not agree that the Truck Lane should be metered. Heavy vehicles, regularly weighing between 55 and 65 tonne gross mass have great difficulty in entering the freeway at freeway speeds from a standing start. The VTA maintains it will be safer and more efficient and would not impede the flow of traffic onto the freeway if the heavy vehicle lane is not metered.

Recommendation 3

The eastbound truck entry ramp onto Grieve Parade should not be metered. The VTA continues to be directly involved at many levels of stakeholder engagement and it also maintains that a range of key issues require further consultation, planning and implementation. These key issues are addressed under each of the following heading.

3.1.3 Millers Road interchange

'Both entry ramps would have ramp meters installed. The ramps would be extended to provide the lane storage required for the ramp meters to operate effectively. Both exit ramps would be shortened: the eastbound ramp by approximately 40 meters and the westbound ramp by approximately 110 meters.' (EES)



The VTA does not agree that trucks should be metered onto freeways as the physical ability of a laden heavy vehicle being able to get up to the required speed to merge safely with freeway traffic is difficult and at times impossible depending upon the road and the associated incline..

Recommendation 4

The eastbound entry ramp from Millers Road should have an additional lane added for heavy vehicles and buses and not be metered in order to allow safer entry to the freeway.

3.1.4 Entry / Exit Ramps-Hyde Street

It is a major concern of the VTA that the design of the access points 'to and from' the freeway onto Hyde Street will need additional work and modification.

Entry from Douglas Parade, turning into Simcock Street before entering the westbound ramp will need to be able to provide a smooth transition for heavy vehicles. The current intersection design is dangerous with heavy vehicles required to perform an 80 degree turn which leads to driver difficulty and uncertainty when trying to manoeuvre through this intersection.

The next intersection with Simcock Street and Stephen Street, heading westbound, also needs to be made suitable for heavy vehicles. The 90 degree turn should be one that enables the heavy vehicle to manoeuvre without having to stop.

The VTA would prefer the shared crossing to be at the T intersection signalling where visibility is greatest for all users.

Recommendation 5

The roadworks planned for the westbound ramp intersections from Hyde Street need to be more compatible and efficiently designed for heavy vehicle access.

The exit ramp from the freeway heading east onto Hyde street intersection will have ongoing safety issues if the shared pathway is offset from the main intersection and will cause heavy vehicles to stop again after proceeding through this signal controlled intersection.

The VTA would prefer the shared crossing to be at the T intersection signalling where visibility is greatest for all users.

Recommendation 6

The shared pathway crossing of Hyde Street at the base of the eastbound ramps are synchronised with the controlled signals and located at the signaled T intersection.

3.2 Tunnels Component

3.2.1 Port Entry – McKenzie Road / Port Exit – McKenzie Road

The VTA has concern on the entry and exit points to the Tunnel at McKenzie Road. Given the focus of these points in servicing the PoM the estimated majority of the 9,000 trips per day will



see increased pressure and demand on the Footscray Road access points. These access points fall outside of the Project boundaries.

The elevated intersections along McKenzie Road need to be managed through signaling that will create heavy vehicle bunching and bottlenecks.

It is important to note that efficient movement into and out of the port is vital and that without a coordinated approach to port access from all road jurisdictions there will be a disconnection as well as, potentially significant issues associated with PoM efficiency for all stakeholders.

Recommendation 7

The VTA strongly advocates that Road planning for this precinct including access routes to Footscray Road, Sims Street and Dynon Road, needs further consultation, research and review before approval. The VTA does not believe that adequate consideration has been placed on the importance of this heavy vehicle precinct.

3.2.2 Non tunnel vehicles and other vehicle exclusion

There is no clear reference to the preferred route that all non-tunnel vehicles and other vehicles that do not have a point of destination within the Inner West which are excluded from using the tunnel. It is important this route be clearly planned and evaluated, then communicated and enforced accordingly.

Recommendation 8

An alternate route be identified and communicated for hazardous, dangerous and other non-tunnel loads that will not be able to use the tunnel.

3.3 Port, Citylink and City Connections Component

3.3.1 Appleton Dock Ramp.

The entry Ramp from Appleton Dock onto the elevated Road heading west has a grade of 5 percent. It also has a merging apron onto the elevated structure. Any heavy vehicle fully loaded, will need to maintain a steady increase of speed to enable a smooth merge with freeway traffic heading westbound towards the Northern Tunnel.

Unfortunately, there is a planned ramp meter that would see all heavy vehicles having to traverse the incline from a standing start and endeavor to merge with oncoming traffic at a much slower speed.

The VTA believes that the application of a ramp meter on this entry point is unnecessary and will lead to unsafe outcomes.

Recommendation 9

That Appleton Dock west bound ramp should not be metered.



4.0 Construction Congestion

With the construction work along Footscray Road and the McKenzie Road points, combined with the closure of Coode Road, there will be significant disruption to the flow of heavy vehicles to and from the PoM, especially for access to the DP World Terminal.

The ability for heavy vehicles, including High Productivity Freight Vehicles (HPFV) that must travel in and out through Wurundjeri Way, to be able to meet their schedules, timetables and customer expectations will be greatly affected. This will create issues with container flows including ships being held in PoM longer, saturation of container holding parks and increased traffic congestion onto other feeder roads.

The VTA does not see any direct reference to this issue and therefore believes it has not been taken into consideration.

Recommendation 10

The Project Team needs to further consider the formulation and publishing of a detailed transport plan that addresses the issues of construction congestion specifically for Footscray Road and McKenzie Road.

5.0 SUMMARY

The VTA has made an assessment of the Project EES based upon the length of the document together with the time and resources available. Issues raised and detailed are by no means definitive of the myriad of issues that are important to the future development of major freight routes and the support of the growth of the PoM.

It is important that the ability to support the movement of High Productivity Freight Vehicles is in focus, fully understood and included in those infrastructure plans.

Surrounding land zoning of not just the PoM but for all major arterials should also be sensitive to the needs of the freight industry and not restrict or constrict movement of vehicles that are servicing the needs of the community.

And lastly, there needs to be a focus on managing congestion during construction that enables efficient flow of heavy vehicle volumes.

The VTA is in support of this vital piece of infrastructure that will see all Victorians benefit.

Peter Anderson
Chief Executive Officer
Victorian Transport Association