MORDIALLOC FREEWAY EES INQUIRY Submission from Public Transport Users Assocation 14 December 2018

The Public Transport Users Association, founded in 1976, advocates for sustainable transport policy in Victoria. The PTUA is deeply concerned about the likely net negative environmental, economic and social effects of the Mordialloc Freeway and believes these have not been adequately considered in the EES Inquiry process. More specifically:

- The PTUA supports the position of the group Residents Against Mordialloc Freeway concerning the effects on the local environment, including RAMSAR wetlands, parkland habitat and heritage sites, and the adverse effects on local traffic, air pollution and noise.
- The PTUA considers that modelling for the EES has not made adequate provision for the likely effect of the Mordialloc Freeway in causing the generation of 'induced traffic', and therefore worsening congestion on the existing road network, as has been observed after the construction of roads elsewhere. The PTUA notes the same conclusion was reached by the 2011 report of the Victorian Auditor-General into major road projects, and there is little evidence that the required substantial reform to assessment guidelines and models has taken place. Transport modeller William McDougall also raised similar concerns before a 2017 Senate inquiry into tollroads: many of Mr McDougall's concerns apply with equal force to the assessment of 'free' as to tolled additions to road capacity.
- The PTUA considers that inadequate consideration has been given to alternative transport measures that would have greater likelihood of achieving the Freeway's purported objectives at least cost, in accordance with legislated requirements.

The Victorian Government has a mandate under the Transport Integration Act 2010 to promote "forms of transport and the use of forms of energy and transport technologies which have the least impact on the natural environment and reduce the overall contribution of transport-related greenhouse gas emissions." This must be done within a triple-bottom-line framework that emphasises user perspectives, community participation and transparency. For the reasons above the PTUA is concerned that these principles are not being adhered to and that the government should be advised to reconsider the project.