

NORTH EAST LINK ENVIRONMENT EFFECTS STATEMENT Inquiry and Advisory Committee

Submission from Public Transport Users Association Inc (Org No A-6256L) 7 June 2019

The Public Transport Users Association, founded in 1976, advocates for sustainable transport policy in Victoria on behalf of the users and supporters of Victoria's public transport system. The PTUA is deeply concerned about the likely net negative environmental, economic and social effects of the North East Link project as documented in the Environment Effects Statement and implied by the concept plans.

Under the *Transport Integration Act 2010* the Victorian Government has a policy mandate to pursue "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." Further, under the Act this must be carried out within a triple-bottom-line framework that emphasises user perspectives, community participation and transparency.

Since the Act was proclaimed in 2010 its guidelines have been consistently ignored when assessing major transport projects in Victoria, the North East Link being the latest instance. Instead of the Project being evaluated by government within a transparent strategic planning framework that weighs it up against alternative transport initiatives with similar objectives, the Project has been framed as a predetermined outcome with only the most cursory comparative analysis, as we detail further below. The habitual approach of modelling the projected costs and benefits of the Project against a hypothetical 'no build' scenario is vulnerable to errors and deficiencies highlighted in previous submissions to State and Federal governments by the PTUA and by transport modelling expert William McDougall. The Victorian Auditor-General's 2011 report on major road projects criticised the approach to project evaluation in similar terms.

Included with this submission for reference are copies of PTUA's submission on Victoria's 2016 Infrastructure Strategy and of PTUA's submission to the 2017 Senate inquiry on tollroads, which provide additional detail on the long-standing deficiencies with transport models and on the phenomenon of 'induced traffic' which renders most of the forecast benefits from new road capacity nonexistent in practice. We would also direct the Committee's attention to the submission by William McDougall to the same 2017 Senate inquiry.

The damage directly caused by the Project both to the natural environment of the Yarra Valley and to local businesses and residents is self-evident, as documented within the EES and in other submissions before the Committee. Further indirect damage will result due to the induced traffic effect greatly amplifying both local noise and pollution and global transport-related greenhouse emissions, that would not result either in a no-build scenario or in an alternative project scenario based on equivalent improvements to public and active transport networks. A decision to proceed with the Project regardless of this damage could only be justified through a substantial excess of benefits over total project costs (including the economic cost of damage). We submit that any such excess benefit is illusory.

Infrastructure Victoria in its 2016 evaluation of the North East Link estimated total project costs of \$5-\$7 billion and benefits around \$8 billion after discounting. According to the 2018 business case, the estimated (P90) project cost is \$15.8 billion in nominal terms and \$12.7 billion in real terms. Applying a 7% discount rate to future cash flows brings the project cost to approximately \$8.5 billion (estimated, as the actual figure is not public)—while the discounted benefits are cited as \$10.9 billion. Both are substantially higher than Infrastructure Victoria's own upper estimates. The difference in benefits in particular is not adequately explained given the Project differs little in its transport outcomes from that considered by Infrastructure Victoria in 2016.

To our knowledge, the only formal consideration of a public transport alternative to the Project appeared in Chapter 4 of the same 2018 business case. 'Strategic Option 3' formulated to address the identified needs comprised the following:

- Duplication of the Craigieburn and Pakenham rail corridors to accommodate freight via intermodal hubs at Donnybrook, Dandenong and Port Melbourne.
- A spur from the Hurstbridge train line to the La Trobe NEIC.
- Extension of tram route 86 to penetrate the La Trobe NEIC.
- Bus improvements in the North East region.
- Improvements to freight logistics including vehicle booking systems, hazardous goods handling and coordination between intermodal hubs.

These measures were estimated to have a capital cost of \$60-75 billion and therefore be prohibitive to implement. No evidence to substantiate these cost estimates was given, nor was any substantive analysis provided as to why this particular list of initiatives was the best suited to address needs at least cost, relative to other rail and public transport initiatives such as the Port Rail Shuttle currently under active consideration by State and Federal governments. A total of 16 pages of the business case report (325 pages plus appendices) was devoted to this and three road-based alternative options to the Project. This is not a reliable evidence base on which to approve a project with this level of environmental damage.

As detailed further in the accompanying reference material, the ability of the Project itself to meet an identified transport need depends on the assumption that the additional road capacity will alleviate congestion and reduce travel times. If the North East Link were merely to repeat the experience with other freeway and tollway projects around the world and reproduce the same congestion with higher traffic volumes, the benefits and justification for the Project would evaporate. This is the most likely outcome. Were the objective simply to increase the volume of travel, with or without time savings, the least damaging way to do so would be to utilise the transport modes that use less space and energy and do not add to the congestion caused by low-occupancy road transport. These modes are trains, trams, buses, bicycles and walking, all of which are likely to suffer from the increase in traffic induced by the Project as currently proposed.

The PTUA particularly objects to the planned resumption of the Eastern Freeway median reserve to add road traffic lanes as part of the project. For over four decades this land has been reserved for railway purposes and positively engineered so that rail infrastructure could be provided with minimal disruption or additional earthworks between Clifton Hill and Bulleen. A double-track railway in this reserve is capable of moving upward of 30,000

people per direction per hour with current technology, compared with a likely capacity less than 4000 per hour on the equivalent road lanes (based on Vicroads Traffic Monitor figures for lane capacity and peak-period vehicle occupancy). The Melbourne Metro 2 tunnel from Newport to Clifton Hill, referred to in a 2012 Network Operating Plan by Public Transport Victoria and supported by several Melbourne councils and local communities, includes provision to extend to Doncaster via this median reserve and a bored tunnel under Lower Templestowe. Taking this median for road lanes would foreclose this option for the sake of infrastructure having less than one-fifth the capacity, and must be opposed.

In place of a Doncaster railway the Project proposes a 'busway', actually a pair of segregated express bus lanes between Hoddle Street and the Doncaster Road Park-and-Ride facility. The proposal is seriously deficient in that no substantive action is proposed on improving bus travel times on the arterial road sections, particularly between Hoddle Street and the city, that now account for the most severe delays. In peak hour it is not uncommon for a bus to take a full hour to travel from the city to East Doncaster, with only 10 minutes of that time actually spent on the Eastern Freeway. The proposed 'busway' is projected to save some three minutes off the fastest portion of the route while not addressing any of the major sources of delay to buses, let alone preparing the way for a rail-based solution that might bypass inner-city roads entirely.

The PTUA considers that the benefits of the Doncaster busway are likely to be minor without substantial complementary measures outside the project area (which would also add significantly to project costs). Nor should any benefits of the busway be imputed to the North East Link itself to boost its benefit-cost ratio, given that segregated bus lanes on the Eastern Freeway can be provided independently of the North East Link.

In conclusion, the PTUA considers that the severe direct and indirect environmental damage from the North East Link, and the accompanying social and economic damage to businesses and residents throughout the project area, are not adequately justified by purported time savings or by economic benefits derived by these time savings. Nor has there been adequate consideration of public transport, active transport and freight alternatives capable of achieving the same objectives and meeting the same travel needs. The North East Link accordingly should not proceed.

In making this submission, the PTUA also supports the submissions on the Project by Friends of the Earth and by Transport 4 Everyone (T4e).

The PTUA welcomes the opportunity to be heard before the Committee in regard to this submission.