

## **Submission to Comprehensive Impact Assessment for the East West Link – Proposed Ormond Road Off-Ramp, Ascot Vale**

**Name:**

**Address:**

**Date:**

### **Summary**

This submission deals principally with the impact of the proposed Ormond Road off-ramp included as part of the East West Link in relation to (1) land-use, dwellings and infrastructure; (2) transport connectivity; (3) visual amenity; and (4) noise, vibration, air emission and light spill.

It summary it argues that planning approvals should not be approved on the following grounds:

- The Ormond Road off-ramp will have unacceptable impacts on residents (including increased noise and air pollution, overshadowing of houses, views to the off-ramp, loss of neighbourhood character and reduced amenity of parkland) which have not been considered in the Comprehensive Impact Statement (CIS).
- The impacts of increased traffic and congestion on Ormond Road (an increase of traffic of more than 60%) as a result of the off-ramp are significant and have not been assessed in the CIS.
- The visual impact of the elevated off-ramp adjacent to a residential area has not been considered in the CIS.
- The noise and air quality impacts from traffic using the off-ramp, and resulting from increased congestion on Ormond Road, are significant and have not been assessed in the CIS.
- There has been no consultation with impacted residents and inconsistent information provided on the off-ramp.

### **Introduction**

I am a resident of Brisbane Street, Ascot Vale which ends at Moonee Ponds Creek and City Link to the east, and runs parallel to Ormond Road and Fenton Street. It is a beautiful tree-lined area with Edwardian and inter-war weatherboard and brick homes (see figures). Part of the neighbourhood was recognised as a Significant Character Area as part of a Planning Scheme Amendment C128 to the Moonee Valley Planning Scheme approved by the Minister for Planning in September 2013<sup>1</sup>.

We moved to the area in August 2012 for the parks, peaceful streets and general amenity. The neighbourhood comprises predominantly families with children, as identified in the CIS. In the six adjacent homes, for example, there are a total of 16 children under 12 years old including our own four year old daughter.

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<sup>1</sup> In the recent Planning Scheme Amendment C128, the Fenton Street / Warrick Street precinct was included as a Significant Character Area, displaying unique and exemplary character requiring greater planning controls. Following inspection of the area, the Panel reviewing the amendment agreed that the strong consistency of the character of surrounding streets - including Brisbane Street and Masoma Street - required further investigation to be included in a wider neighbourhood character precinct. The Moonee Valley City Council subsequently agreed to consider Brisbane Street and Masoma Street as part of a separate study (*Planning and Environment Act 1987* - Panel Report - Moonee Valley Planning Scheme Amendment C128 22 March 2013: p 13-14).

It is feared that the construction of the Ormond Road off-ramp will dramatically impact our quality of life and that of others in the area, and that these impacts have not been properly considered in the CIS.

The inclusion of the Ormond Road off-ramp was announced via the media on 30 October 2013 and was not included in the original plans for the East West Link nor publically mentioned prior to 30 October. The proposed off-ramp will run at elevation at the east end of Fenton Street and Brisbane Street over Moonee Ponds Creek and on to Ormond Road.

From images available at the Linking Melbourne Authority (LMA) information session on 16 November 2013 the off-ramp will be an elevated two lane roadway which will be visible from Brisbane Street and Fenton Street, and will clearly dominate the neighbourhood. Other residents on Mooltan Street, Myrnong Crescent, Hockey Lane and Ormond Road will also be affected.

The impacts of the off-ramp have not been considered in much of the CIS (for example, the off-ramp has not been considered as a visual impact in Chapter 10, the Land Use Planning Impact Assessment in Appendix F or in the Urban Design Framework in Appendix C). In addition, to date there has not been consultation with impacted residents or adequate information made available of the proposed works.

Further details on the impacts of the off-ramp are provided below.

#### **(1) Land use, dwellings and infrastructure**

The elevated off-ramp fails to respect the character of the neighbourhood, and will cause substantial impacts on residents.

The only social impact the CIS identifies in relation to the off-ramp relates to the loss of part of the community garden at the base of Brisbane Street. The impact on residents has not been considered.

Families on Brisbane Street and Fenton Street will have an elevated off-ramp immediately adjacent to their homes. Most of these homes include families with small children or elderly people. Houses that were more than 110 metres from City Link will now be 20-30 metres or closer to an elevated off-ramp more than 10 metres high. Residents will be impacted by increased noise and air pollution from both the off-ramp (12,000 vehicles a day with an average vehicle queue length of 57 metres in the afternoon peak) and additional two north lanes added to City Link, as well as overshadowing and views to the off-ramp.

The CIS recognises that the area includes a high percentage of homeowners, and therefore sensitivity is required in relation to landscape and visual impacts. However, images provided at the information session held by LMA on 16 November 2013 show that the elevated off-ramp will clearly dominate and alter the character of the neighbourhood. The off-ramp is not included in the Urban Design Framework in Chapter 10 of the CIS.

A popular children's playground at the base of Fenton Street will be immediately adjacent to the off-ramp. Further, the off-ramp will be built over part of the Brisbane Street Reserve and what will remain of the Reserve will be overshadowed making it unusable. The overshadowing will also impact the community garden resulting in the loss of up to one third of the available garden plots. The off-ramp will be built over the

Moonee Ponds Creek preventing any opportunity in the future to restore it to its natural state.

The social impact of the proposed off-ramp is already being felt by the local community. There are high levels of anxiety and some residents are seeking valuations on their properties wanting to sell “before it is too late”. Discussion with a local real estate agent has indicated that the visual impact of the off-ramp, noise levels and other intrusions from the off-ramp would be likely to affect the value of homes in the area.

Other impacts on residents can be expected from light spillage, vibration, air pollution, noise and safety both during and after construction, and as a result of increased traffic, congestion and ‘rat-running’ through residential streets once the ramp is in operation.

Access to parks will also be prevented during the construction phase (Ormond Park, the children’s playground on Fenton Street, Travancore Park, Ormond Park and other green-space) and the attractiveness of these areas will be greatly reduced and unlikely to be of value as public open space once the off-ramp is in operation.

## **(2) Transport Connectivity**

The CIS has not considered the impact of the off-ramp in respect to traffic on Ormond Road and other roads.

Figure 7-20 on page 40 of Chapter 7 of the CIS indicates that that traffic volumes will significantly increase in the inner west (Ascot Vale, Moonee Ponds and Travancore) and decrease in the inner north as a result of the East West Link. The figure indicates that with the off-ramp, traffic on the already congested Ormond Road will increase by 30-40% by 2031. Other local streets will also have significant increases in traffic (for example, a 20% increase of traffic is projected on Mooltan Street). No mitigation measures are discussed.

Communication with the LMA (on 1 December 2013) indicates that the off-ramp will result in an additional 12,000 vehicles per day using the Ormond Road. Vic Roads data indicates that in 2012 there was an average of 9,900 vehicles per day in either direction on Ormond Road between City Link and Maribyrnong Road (a total of around 19,800 vehicles per day)<sup>2</sup>. Subsequently the introduction of the off-ramp will actually result in a 60% increase in traffic on Ormond Road!

There are existing bottlenecks at the junction of Ormond Road with Mt Alexander Road, Ormond Road with Brunswick Road, Maribyrnong Road with Union Road and Moonee Ponds Junction. These bottlenecks exist throughout the week and are not restricted to peak times.

The GHD report included as an appendix to the CIS indicates that Ormond Road already suffers from congestion due to the capacity constraints at either end of the road (with the existing City Link ramps on Ormond Road, and street parking and trams on Mt Alexander Road)<sup>3</sup>. The report, however, does not consider the impact of increased congestion with addition of the Ormond Road off-ramp or mitigation measures.

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<sup>2</sup> Arterial Traffic Volumes for Ormond Road available at [www.vicroads.vic.gov.au](http://www.vicroads.vic.gov.au)

<sup>3</sup> Appendix E, page 50

Currently the only way to avoid traffic jams on Ormond Road is to take short-cuts ('rat-running') through local streets, including Myrnong Crescent, Mooltan Street, Stuart Street and Pattison Street. The Ormond Road off-ramp will result in increased 'rat-running' by cars and trucks through arterial roads and residential streets, increasing noise and creating safety issues.

As the Ormond Road off-ramp will be the first exit available for vehicles leaving the tunnel it would be expected there would be high levels of traffic wanting to avoid further tolls. This will result in further 'rat running' through residential streets in Ascot Vale and Moonee Ponds.

The CIS also indicates that traffic will be queuing on the off-ramp during peak times (an average of 57 metres in the afternoon peak)<sup>4</sup>.

On 2 October 2013 VicRoads provided a submission to Planning Panels Victoria in relation to the proposed Moonee Valley Racecourse Redevelopment<sup>5</sup>. It found that Moonee Ponds Junction and those arterial roads that feed into the junction are currently experiencing high levels of congestion, particularly during peak times. The unique characteristics of the junction also have flow on affects on other roads with congestion banked up as far as Buckley Street in the morning peak and Ormond Road in the afternoon peak. In addition it was found to have impacts on other intersections away from Moonee Ponds Junction and was one of the primary reasons for rat-running through local streets in order to avoid congestion.

On this basis, VicRoads opposed the Racecourse development in its existing form as it would adversely affect the local street network, place unnecessary pressure on existing arterial roads and public transport networks, and provide safety issues.

It should be noted that the traffic projections in relation to the Racecourse development (6,000 vehicles per day) are significantly lower than what is proposed for the Ormond Road off-ramp.

It is understood that the intention of the Ormond Road off-ramp is to provide an alternative route from Elliot Avenue for people wanting to travel to the north-west and reduce projected traffic turning on to Mt Alexander Road. LMA has indicated that an additional two turning lanes would be required at Elliot Avenue if an off-ramp at Ormond Road was not provided.

Considering the impacts of the proposed Ormond Road off-ramp on residents other options need to be explored.

I have a number of specific questions:

- What other options have been considered to the Ormond Road off-ramp and how would these options affect the communities of Ascot Vale, Travancore and Moonee Ponds?
- What traffic would the new off-ramp actually service which is not already covered by existing and proposed exits?

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<sup>4</sup> Appendix E, page 25

<sup>5</sup> Moonee Valley Racecourse Redevelopment Advisory Committee, Amendment C120 & C124 Opening Submission on behalf of VicRoads – available on web.

- What is the cost benefit of the off-ramp (i.e. how many people receive time / benefit verses the cost of the off-ramp development, upgrade of adjoining arterials, and social and health impacts)?
- How will the 'knock on' problems in terms of mitigation of existing and new congestion and other issues created by the off-ramp be resourced?
- Are the further plans to widen and extend the road network in this area to support increased traffic from the Ormond Road off-ramp?

### **(3) Visual Amenity**

The off-ramp is entirely missed in Chapter 10 of the CIS, though this will clearly have a significant visual impact.

An elevated off-ramp would may be appropriate in an industrial or commercial zone but not in a residential area.

Since the media announcement on 30 October 2013, information on the design of the off-ramp has been inconsistent. A video was placed by the LMA on You Tube on 30 October 2013 which suggested a low one lane off-ramp. Graphics of an elevated two lane off-ramp were shown at the LMA information session on 16 November 2013. The GHD report included as an appendix to the CIS indicates that the off-ramp would be one lane<sup>6</sup>. Other residents have been informed by LMA that there will be a large wall separating the off-ramp from houses, which from queries made to LMA on 16 November 2013 is apparently not the case. No additional information has been available on the LMA website.

Consequently, most people would have no idea that the off-ramp will be elevated and tower over houses at the foot of Brisbane and Fenton Street, and as there has been no consultation, some residents are completely unaware that an off-ramp has even been proposed.

Currently, City Link and the existing noise wall are not visible from Brisbane Street and Fenton Street, with the Moonee Ponds Creek providing a visual buffer between homes and City Link. The elevated off-ramp will dominate the streetscape. Elsewhere it is noted in the CIS that a "surface or elevated road could have significant visual and amenity impacts" and in the Urban Design Framework the need to "minimise the extent and impact of elevated road structures where possible". The Ormond Road off-ramp will clearly change the unique character, attractiveness and amenity of the area.

In the maps provided with the CIS, the placement of the Ormond Road off-ramp has not considered the location of houses but the relationship of the proposed off-ramp to the existing on-ramp at Ormond Road (which will be moved slightly to the west).

Similarly the graphic of the intended intersection at Ormond Road has not considered minimisation of impacts to surrounding residences. From the LMA information session on 16 November 2013 a large barrier is proposed on the west and south side of Ormond Road. Other than visual impacts, the barrier may overshadow houses on Brisbane Street. Again this graphic is not available on the LMA website or discussed in the CIS.

The CIS does not consider the heritage values (which includes heritage overlay and places included on the Victorian Heritage Register) or the preservation of unique character of the area.

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<sup>6</sup> Appendix E, page 75

Options for placement of the off-ramp should be considered for the City Link side of Moonee Valley Creek to reduce impacts to residents and allow for the retention of Brisbane Reserve. The Toorak intersection on the Eastern Freeway provides an example of a better - though I expect more costly - engineered solution.

#### **(4) Noise, Vibration, Air Emissions and Light Spill**

The off-ramp, intersection and traffic on Ormond Road will result in increased noise and air pollution which has not been considered in the CIS. The Ormond Road off-ramp is not mentioned in the report and does not appear to have been considered as part of the assessment.

As mentioned, communication with the LMA indicates that there will be an increase of more than 12,000 vehicles per day on Ormond Road (an increase of 60%) with traffic forecast to increase over time.

The area already experiences high noise levels from Ormond Road and the freeway (including from City Link and on-ramp adjacent to Ormond Park where there is no noise wall), and we fear that noise and air pollution levels will increase significantly with the proposed off-ramp.

The two added north lanes on City Link and the two lanes on the off-ramp will mean that there will be an additional four lanes of traffic, which along with increased traffic on Ormond Road, will significantly add to noise and air pollution levels around Brisbane Street, Fenton Street and other locations.

Research indicates that that prolonged stop-start traffic particularly in up-hill and down-hill patterns also create higher levels of noise. Further, greater noise levels would be expected from trucks using the off-ramp and Ormond Road. In the case of truck traffic in Yarraville, for example, the EPA has found noise levels to average 77 decibels. The height of the off-ramp would also carry light and noise over large distances.

On 16 November 2013 the LMA indicated that a noise wall would not be practical because of the height of the elevated off-ramp. In addition the CIS indicates that a noise wall will not be constructed at Ormond Park - although recommended in the GHD report - due to the Concession Agreement with City Link. The Chief Engineer from LMA, however, indicated that this would be constructed at the information session held on 16 November 2013.

The impact on air quality as a result of the off-ramp and increased traffic (including trucks) on Ormond Road has also not been considered by the CIS (which only considers air quality on City Link).

Information provided by LMA<sup>7</sup> and other research indicates that emissions from stop-start traffic as would be expected at the off-ramp and associated intersection is greater than constant stream of traffic currently experienced on City Link, and will result in emission of high levels of hydrocarbons, nitrogen oxides and other toxic pollutants from petrol and diesel car exhausts.

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<sup>7</sup> LMA Video 'Noise and Air Quality' released on 22 November 2013.

The CIS also indicates that traffic will be backed up on the off-ramp at peak times (an average queue length of 57 metres in the afternoon peak) adding to the noise and air quality issues.

The health impacts of diesel smoke from trucks using the off-ramp and Ormond Road are a major concern. The World Health Organisation recognises diesel as a carcinogenic, with a direct link between diesel exhaust and cancer.

Research by the University of NSW indicates that there are significant health impacts on children associated with traffic and congestion<sup>8</sup>. Exposure to vehicle emissions, road dust and tyre fragmentation together cause an increase in the atmospheric levels of carbon monoxide, sulphur dioxide and nitrates. There is a documented increase in mortality and morbidity from respiratory and cardiac diseases, and evidence that these impacts are greater on children<sup>9</sup>.

Considering the off-ramp will run adjacent to a popular children's play-park on Fenton Street, and the number of children in the residential area to be affected by the off-ramp, the impact on air quality needs to be assessed as a priority.

## **Conclusion**

The CIS indicates that the key social benefit of the East West Link will be the reduction in traffic using local surface roads in inner north areas. This will allow for these areas to be safer, cleaner, quieter and more attractive places to live.

For our part of Ascot Vale, however, the East West Link will result in one of the more beautiful, desirable and family friendly parts of inner Melbourne becoming unsafe, dirty, noisy and unattractive.

The Urban Design Framework (Chapter 10, page 20) indicates that the impacts on local communities as a result of loss of amenity, parklands, sport facilities and access to public open space are offset by the provision of high quality urban design outcomes for road users. This is clearly inappropriate and implies that roads have precedence over communities.

The decision to include an off-ramp at Ormond Road has not been properly addressed in the CIS.

The CIS indicates that consultation on the East West Link occurred before 30 September 2013. The Ormond Road off-ramp was included in the project design until 30 October 2013.

Since the announcement of the Ormond Road off-ramp, the LMA has not communicated with impacted residents other than (a) a letter providing dates of public information sessions to those residents immediately adjacent to the proposed off-ramp and (b) general newsletters talking about the benefits of the East West Link, public information sessions and timelines for the project.

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<sup>8</sup> Peter Rickwood & Dr David Knight 2009 *The Health Impacts of Local Traffic Pollution on Primary School Aged Children* University of New South Wales – available on web.

<sup>9</sup> See also Carol Potera 2006 *The Freeway Running through the Yard: Traffic Exhaust and Asthma in Children*. Environ Health Perspectives – available on the web. This US study found that kindergarten and first grade students who lived near busy roads experienced a higher prevalence of asthma, and recommended locating playgrounds and parks away from busy roads to prevent children from inhaling exhaust fumes.

Since the release of the CIS, several information sessions have been held in the inner-west. However, the LMA appears to have focussed its consultation efforts (including BBQs) in the eastern suburbs where people will not be impacted by the project.

In addition, information on the off-ramp has been inconsistent. Consequently, many people would have no idea that the off-ramp will be elevated and some residents are completely unaware that an off-ramp has even been proposed. Some maps included in the CIS do not include the off-ramp (for example, page 3 of Appendix D). Further many parts of the CIS do not refer to the off-ramp as part of the project.

The CIS is a technical document that most people without expertise (including myself) would find difficult to understand. This is particularly the case with the noise and pollution indicators as well as traffic flow data and other information.

Whereas it is understood that there is urgency to sign contracts for the East West Link before the election in November 2014, processes need to be followed to ensure that people are properly informed and impacts are fully considered.

Based on the information provided above, it is requested that Assessment Committee recommend that the required planning approvals should not be granted by the Minister for Planning.



**Brisbane Street, Ascot Vale**



View of Brisbane Street, Ascot Vale looking west. It is a beautiful street characterised by Edwardian and inter-war houses.



View of Brisbane Street, Ascot Vale looking west.



View of Brisbane Street, Ascot Vale looking east. Currently, City Link or the existing noise wall is not visible from the street with Moonee Ponds Creek acting as a buffer. The proposed off-ramp will tower over these buildings and will dominate the visual landscape for all houses located on Brisbane Street and part of Fenton Street (arrows showing approximate height).



East end of Brisbane Street showing relationship of homes to the proposed elevated off-ramp. The off-ramp will be approximately 30m from the houses shown (situated behind the white car) where it will be at elevation in order to join Ormond Road (arrows show approximate height of the proposed off ramp).





View across Brisbane Reserve at the proposed off-ramp entry point onto Ormond Road. Note houses in the background. Houses on Brisbane Street (not visible) are adjacent to the trees on the right of the picture. The community garden is and at the end of the grassed area and traffic turning circle (centre of the picture).

### **Fenton Street Ascot Vale**



View of Fenton Street, Ascot Vale looking west.



Fenton Street, Ascot Vale looking east. There is currently no view of City Link or the noise wall, and the playground at the end of the street is a popular with local children. The off ramp will tower over these houses (see arrows for approximate height) and destroy the unique character of the area.



View east at the end of Fenton Street showing the position of homes in relation to the proposed Ormond Road off ramp. The off-ramp will be at a similar height and position to the trees at the end of Fenton Street (centre of the picture).





Children's playground at the end of Fenton Street. The proposed off-ramp will tower of this playground and overshadow homes. Two young children live in this home which will be badly affected.



View north showing playground, community garden and homes at the end of Fenton Street, all of which will be overshadowed by the off-ramp.