

SUBMISSION

Victorian Parliamentary Inquiry into Health Impacts of Air Pollution in Victoria With Special Emphasis on the NE Link Project and the Proposed Widening of the Eastern Freeway



Koonung Creek Wetlands – Elgar Park Mont Albert North likely to be completely destroyed by Eastern Freeway widening works

Submission Prepared by:

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Table of Contents

| | | |
|----|---|----|
| 1. | Introduction | 3 |
| 2. | Air Pollution and Roads | 4 |
| 3. | Climate Change | 5 |
| 4. | Legislation Relating to Public Health and Air Pollution from Roads .. | 6 |
| 5. | Recommendations | 6 |
| 6. | References..... | 13 |



Acknowledgement to the late Ron Tandberg

1. Introduction

Submitter / objector details:

My name is John Young and I live [REDACTED]. I have lived at this address since 1976. I live adjacent to the Eastern Freeway on the southern side, within 100 m. of the Surrey Road – Freeway west bound on-ramp intersection.

I am a retired occupational health and safety consultant with over 46 years of full time experience in matters related to public health, environment protection and occupational health and safety with tertiary and vocational qualifications in all of these fields.

I, along with many other concerned residents and environmental groups gave an oral and written submission to the Environment Effects Statement Inquiry and Advisory Committee in 2019. Alas all to no avail. Planning Minister Wynne ignored the Committee's recommendation citing the reckless "Jobs and Growth" mantra.

I am a member of the Stop NE Link Alliance; Sustainable Cities – Public Transport Users Association / Friends of the Earth; the Public Transport Users Association and a number of other environmental and conservation groups.

Summary of my submission:

I object to the construction of the appalling NE Link so called 'freeway' and the proposed widening of the Eastern Freeway for a considerable number of environmental, social and amenity issues including the unavoidable increase in air pollution.

I consider that I and many hundreds of thousands of people living in the north eastern suburbs of Melbourne will be directly adversely affected by the increased air pollution resulting from this disastrous project both during construction and thereafter.

What right does the Andrews' Labour government have to put our health at risk when it is fully aware that southbound traffic pouring off NE Link at Bulleen will increase on the Eastern Freeway exponentially and that the freeway sits in a pollutant trapping valley along the Koonung and Mullum Mullum creeks?

The government knows that the route of NE Link and the Eastern Freeway pass very near dozens of sensitive receptors such as child care, kindergartens, schools and aged care facilities, (see attached Photographs and list in Appendix A).

This NE Link project should be abandoned completely. The negative effects including increased air pollution far outweigh the positive effects (if any).

The dumping of tens of thousands of extra motor vehicles into central Melbourne should not be used as an excuse to build the so-called 'East West Link', which seems to be an obsession of the state Liberal Party. Clearly far more people would then be exposed to motor vehicle pollution in the much more densely populated inner suburbs along the northern and western fringes of the city centre.

Freeways do not solve traffic problems, they merely shift the traffic jams elsewhere and clog up with traffic as soon as they are constructed. There are many other solutions to traffic problems which should be used before constructing any new freeways particularly in densely populated metropolitan areas.

2. Air Pollution and Roads

The Andrews' Labour government appears to be adopting the 'Beijing Smog' model in the control of motor vehicle emissions.

Associate Professor Vicki Kotsirilos in her excellent paper on the '*Health Impacts of Air Traffic Pollution – Why freeways should not be built in or adjacent to an urban environment*' (reference 3) discusses the huge rise in the number of cars per family, population growth and the enormous increase in housing development in the outer suburbs with their general lack of public transport causing even greater pressure on suburban roads and clogging major arterials in the daily commute.

Motor vehicles are a major source of air pollution. Associate Professor Vicki Kotsirilos quotes Vic EPA data on the emissions from motor vehicles, (page 5, reference 3) as follows:

- 72% of all carbon monoxide (CO) emissions
- 70% of all nitrogen oxide (NO_x) emissions
- 28% of all volatile organic compound (VOC) emissions
- 31% of all emissions of particles smaller than 2.5 microns (PM_{2.5})
- 27% of all emissions of particles smaller than 10 microns (PM₁₀)
- 6% of all sulphur dioxide (SO₂) emissions; and
- Nitrogen oxides (NO_x) and VOC's can combine to form ozone (summer smog).

Kotsirilos cites Barnett 2014 that urban air pollution contributes to an estimated 3000 deaths per year in Australia and that there is no safe lower limit thus any increase in vehicle emissions will result in detrimental health impacts, (page 5, reference 3).

In a paper by Environmental Justice Australia, *The People's Clean Air Action Plan for Victoria* a similar figure of between 2616 and 4884 premature deaths due to air pollution annually in Australia is cited, (page 3, reference 5).

The International Agency for Research Cancer, World Health Organization, Lyon, France classifies air pollution as a human carcinogen. The most dangerous form of air pollution is a carcinogen PM_{2.5} according to Dockery, Douglas W. et al., (1993) *An Association between Air Pollution and Mortality in six US Cities – New England Journal of Medicine*, (page 10 reference 5).

In a very comprehensive article, *Pollution Warning on North East Link* by Ms Timna Jacks in *The Age* newspaper of 30 May 2020 she states that vehicle emissions along the NE Link and the Eastern Freeway will fail the state's new air pollution standards. Predicted PM_{2.5} levels of this known carcinogen will exceed daily limits on NE Link by 2036 and will exceed the new limits the government is introducing in 2025 two years before the road is completed, (reference 7).

With an extra 100,000 more vehicles per day on the Eastern Freeway the amount of PM_{2.5} will be 29 micrograms / m³ by 2036 breaching the current standard of 25 micrograms / m³ and a tougher target introduced by 2025 of 20 micrograms / m³ (reference 7).

The NE Link Environment Effects Statement - Chapter 10 *Air Quality* has two pages covering air quality related to the Eastern Freeway. This is too lengthy to summarize here except to say that modelling has predicted much worse air pollution due to increased traffic volumes. Increases of up to 96% and 87% are predicted for some parameters. Maximum pollutant concentrations for 24 hour average and annual average were predicted for PM₁₀ and PM_{2.5} virtually at my doorstep. Similarly, maximum pollutant concentrations for one-hour average and annual average NO₂ were predicted again along the Eastern Freeway past where I and thousands of other people live, (page 10-25 and page 10-26, reference 8).

Why is this situation being allowed to occur? As stated in the introduction, what right does the government have to risk my health and that of thousands of other residents? Surely the government and NELP are potentially in breach of the *Public Health and Wellbeing Act 2008* and the *Environment Protection Act 1970*?

Section 2 of the *Environment Protection Act 1970* states: This Act shall bind the Crown in right of Victoria, *inter alia*.

Section 13 of the *Public Health and Wellbeing Act 2008* states: This Act shall bind the Crown *inter alia*. Local Municipalities also have a duty under this Act to protect the health and wellbeing of residents.

3. Climate Change

Every day the media is full of dire warnings concerning climate change which should more properly be called the climate emergency. Scientists have been warning us for many years on the need to reduce greenhouse gases and most people now appear to accept that human activities have caused this catastrophe. The debate still appears to revolve around what should be done with our current federal government notably missing in action on the world stage.

That we face an existential threat to life on earth has often been ignored by many commentators as being too confronting. Professor Tim Flannery in his book *“Now or Never – A Sustainable Future for Australia”*, (page 26, reference 1) quotes the celebrated climate change scientist James Lovelock in his book, *“The Revenge of Gaia”* that although Lovelock believes there is still time to avert catastrophe he believes that humans lack the foresight, wisdom and political energy required to do so. Lovelock believes that by the end of the 21st century global civilization will have collapsed.

Similarly, Jane Morton of *Darebin Climate Action Now* quotes Professor Kevin Anderson in her booklet, *Don't Mention the Emergency? – Making the Case for Emergency Climate Action*, (page 9, reference 2), that “a 4°C future is incompatible with an organised global community, is likely to be beyond ‘adaptation’.....If you have got a population of 9 billion by 2050 and you hit 4°C, 5°C or 6°C, you might have half a billion people surviving”.

This situation is incomprehensible especially considering yet another dire warning from the UN IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services) on the potential global loss of a million species due to climate change.

So what does this have to do with air pollution in Victoria? Clearly we all have an obligation to minimise our impact on the environment however governments have a duty of care to protect public health and to meet international conventions and moral obligations concerning climate change. This includes preventing or minimising discharges to atmosphere that contribute to climate change including vehicle emissions.

The state government's approach to reducing Victoria's climate change impact in a number of areas has been commendable; however it is both hypocritical and contradictory in the extreme for the Andrews' Labour government to encourage motor vehicle use by the construction of more and more urban freeways thus contributing to increasing climate changing emissions.

Transport – cars, trucks, public transport, domestic flights and shipping – is Australia's second largest source of greenhouse gas pollution. The sector emitted 102 million tonnes carbon dioxide (MtCO₂) in 2018, representing 18% of Australia's annual greenhouse gas pollution. Transport emissions have the highest rate of growth of any sector since 1990, (reference 4).

Australia ranks at 20th near the bottom of the 2018 Global Rankings Table on transport energy efficiency near notable energy guzzlers such as Saudi Arabia and the United Arab Emirates, (reference 4).

According to an article in the *Sunday Age* by Ms Timna Jacks on 19 July 2020 the transport sector is the second largest contributor of greenhouse emissions in Victoria, making up a fifth of the state's total emissions. Dr Nick Aberle of Environment Victoria is quoted as stating that "a major investment in public transport was needed to encourage people to use trains, trams and buses over the construction of major highways", (reference 6).

4. Legislation Relating to Public Health and Air Pollution from Roads

Public Health and Wellbeing Act 1970

Environment Protection Act 2008

Transport Integration Act 2010

Major Transport Projects Facilitation Act 2009

5. Recommendations

Recommendation 1

The NE Link project should be abandoned completely. The negative effects including from increased air pollution far outweigh the positive effects. Freeways do not solve traffic problems and become congested as soon as they are constructed shifting traffic jams elsewhere.

Recommendation 2

If this project is to proceed it should be halted until the project design is amended to ensure air pollution standards will not be exceeded and that air pollution levels remain at or below existing 2021 levels.

Recommendation 3

The government must guarantee that public health will not be adversely affected by this project. If this cannot be achieved the project must be abandoned.

This concludes the submission.

John Young GradDipEnvSc, MOHS, FRSPH, CFSIA, ChOHSP

PHOTOGRAPHS



Photograph 1: Walking track between Eastern Freeway & rear of houses on Douglas St. Blackburn North looking east. It is likely that the noise 'barrier' will be moved much closer to the rear fences.



Photograph 2: Old Orchard Primary School, Koonung Road, Blackburn North approximately 550m south of the Eastern Freeway.



Photograph 3: View towards on and off ramps over Eastern Freeway looking north outside the ironically named Belle Vue primary school adjacent to the school crossing.



Photograph 4: Bell Vue Primary School, Balwyn North



Photograph 5: View looking south on Blackburn Road, East Doncaster adjacent to Beverley Hills Primary School. The Eastern Freeway is at the bottom of the hill approximately 350 m from the school boundary.



Photograph 6: Beverley Hills Primary School on Blackburn Road, Doncaster East adjacent to the school crossing shown in photograph 5.



Photograph 7: Katrina Pre-school and Kindergarten, Katrina Street, Blackburn North. This kindergarten is approximately 400m south of the Eastern Freeway.



Photograph 8: Box Hill North Primary School and Kindergarten, near Woodhouse Grove, Box Hill North. The northern boundary of this school is approximately 200m from the Eastern Freeway.



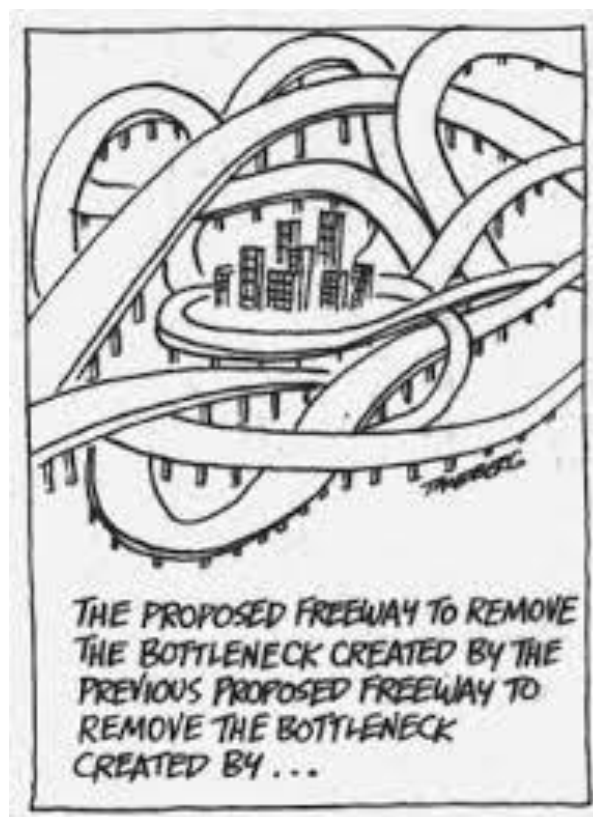
Photograph 9: Kerrimuir Primary School, corner of Dorking Road and Molbray Street, Box Hill North. This school is approximately 550m south of the Eastern Freeway



Photograph 10: Eastern Freeway traffic sewer at midday looking east towards Blackburn Road. Note reasonably well treed and landscaped road side, all to be presumably lost in a road widening concrete canyon.



Photograph 11: Los Angeles style 'spaghetti junction' proposed interchange, Bulleen. Note that this road design engineering failure is very near the Belle Vue Primary School. The image shows where much of the loss of the Boroondara Tennis Centre, the Freeway Golf Course, private school playing grounds and the extensive parkland and wildlife corridor adjacent to the Yarra River will occur. (Melway 2017 Map 32)



With acknowledgement to the late Ron Tandberg

Photograph 12: A more realistic view of traffic problems inducing more air pollution inducing more air pollution.....

6. References

1. Flannery, Tim; *Now or Never – A Sustainable Future for Australia*. Published by Black Inc. (2009)
2. Morton, Jane; *Don't Mention the Emergency? – Making the Case for Emergency Climate Action*. Published by Darebin Climate Action Now (2018)
3. Kotsirilos, Vicki *Health Impacts of Air Traffic Pollution – Why freeways should not be built in or adjacent to an urban environment*. Journal or Publisher not cited (16 February 2019)
4. Climate Council; *What's the Deal with Transport Emissions?* (22 December 2016)
5. Environmental Justice Australia; *The People's Clean Air Action Plan for Victoria* (Undated)
6. Jacks, T *Transport out of step on Emissions*; *The Sunday Age* (19 July 2019)
7. Jacks, T *Pollution Warning on North East Link*; *The Age* (30 May 2020)
8. North East Link Environment Effects Statement – Chapter 10 *Air Quality*

Appendix A

Sensitive Receptors

Just some of the Schools, Kindergartens and Aged Care Residences within approximately 500m of the proposed widening of the Eastern Freeway without consideration of any NE Link section Sensitive Receptors

- Heatherwood School, Springvale Road, Donvale
- Donvale Primary School, Elata Street, Donvale
- Beverley Hills Primary School, Blackburn Road, Doncaster East
- Kindergarten, Kett Street, Blackburn North
- Saint Phillip's Catholic Primary School, Junction Road, Blackburn North
- Whitehorse Primary School and Kindergarten, Junction Road, Blackburn North
- Kindergarten, Katrina Street, Blackburn North
- Old Orchard Primary School, Koonung Road, Blackburn North
- Kerrimuir Primary School, Dorking Road, Box Hill North
- Box Hill Nth Primary School & Kindergarten, off Woodhouse Grove, Box Hill Nth
- Presbyterian Theological College, Elgar Road, Box Hill North
- Elgar Home Aged Care, Elgar Road, Box Hill North
- Applewood Retirement Village, Tram Road, Doncaster
- Birrale Primary School, Heyington Avenue, Doncaster
- Koonung Secondary College, Elgar Road, Mont Albert North
- Saint Bridget's Catholic Primary School, Sweyn Street, Balwyn North
- Belle Vue Primary School, Bulleen Road, Belle Vue
- Greythorn Bowling Club, Park Avenue, Doncaster