Submission to Infrastructure Victoria

2023-05-30 11:30:03

Q1. A bit about you. Who is writing this idea? If you are submitting on behalf of an organisation please also identify this here.

Victorian Transport Action Group (VTAG)

Q2. What matters to you?

Please refer to the VTAG submission, attached

Q3. Your proposed ideas: What strategic idea/s are you proposing for the 30-year infrastructure strategy that will achieve your desired outcomes?

Please refer to the VTAG submission, attached

Q4. Why do you think your proposed ideas are better than the other options you might have considered?

Please refer to the VTAG submission, attached

Q5. What sources of information do you think Infrastructure Victoria needs to consider when developing the 30-year Infrastructure Strategy for Victoria?

https://engage.vic.gov.au/dash/project/1223/submission/survey/1107833/attachment/dXBsb2FkOjIwMjMtMDItMTlUMTE6MDg6MjEuNTMxWg==-0-vtag-submission-to-iv-infrastructure-strategy-may-2023.pdf/download

Q6. How are the documents or information you have shared relevant to your idea?

Please refer to the VTAG submission, attached

VTAG VICTORIAN TRANSPORT ACTION GROUP

Email: info@victransport.com.au Facebook: www.facebook.com/victoriantransportactiongroup

VTAG Submission to Infrastructure Victoria 30-Year Infrastructure Strategy

May 2023

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About the Victorian Transport Action Group (VTAG)

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum focused on solutions to Victoria's transport challenges.

Members of VTAG have expertise across passenger and freight transport, urban and regional planning, State and Local Government, I.T. and the environment, engineering, architecture, and urban design.

VTAG has an extensive network of connections in state, local government, industry, and academia across planning and public transport that it draws on for insights into the complexity of transport issues and seeks to provide options for equitable, practical, and constructive solutions.

Members are familiar with the challenges of developing and implementing transport plans across all transport modes and understand the difference between blue sky ideas and the reality of funding, political interest, and community support. We are particularly conscious that limits on funding necessitate placing priorities on projects and of the need to conduct balanced examination of often competing agendas. We strive to achieve that objective.

Contact:
[redacted]

Introduction

The Victorian Transport Action Group (VTAG) welcomes this opportunity to provide input to Infrastructure Victoria's (IV) 30 Year Infrastructure Strategy.

IV has asked:

- How and where should infrastructure be delivered to support fairer access for all Victorians?
- How can infrastructure sustainably drive economic prosperity?
- How can infrastructure help reduce the impacts of climate change, and be adapted to withstand more frequent and extreme weather events?
- How can infrastructure improve Victoria's resilience to future shocks and disruption?

VTAG believes the answer to these questions is to recognise and address the existential threat of human-induced climate change. To discuss matters of fairness, prosperity, adaptation and resilience imply Victoria can proceed on a business-as-usual basis when all evidence points to a rapidly approaching crisis. Without immediate steps to achieve net-zero emissions within the near term, Victoria and the global community will face a massive dislocation.

VTAG would urge IV to use this update of the Victorian 30-year Infrastructure Strategy to call for radical change in policies, planning approaches and investment strategies to accelerate the transition to net-zero and prepare the state for a future where energy may be neither plentiful nor cheap.

This submission focuses on matters concerning urban transport. The following sections follow the same structure as IV's 2021 strategy.

The next section, Confront long-term challenges, critiques the state's bias towards new infrastructure and IV's current strategy to reduce emissions, finding neither is fit for purpose. The subsequent sections then review the specific recommendations of the 2021 Strategy, highlighting those that VTAG recommend for review in the current update.

Confront long-term challenges.

Victoria has a great deal of infrastructure that is not used to its maximum potential. The necessary politicisation of planning decisions demonstrates a bias towards building new infrastructure instead of fully utilising what already exists. We have already covered vast areas of the state with extensive roads (and to a lesser extent rail networks) that could be better utilised for the benefit of all transport modes. IV plays an important role in bringing rationality to the decision-making process – where strategies are developed to meet agreed policy objectives rather than to serve some political purpose.

To be serious about reaching net zero carbon in a timely manner, we will need to seriously address the allocation of carbon/energy/non-renewable resources into major new capital works infrastructure projects. This is a key argument for making better use of the infrastructure we already have (especially existing roads). For example, an alternative road-based approach to improving Melbourne's orbital public transport would involve some new infrastructure (platform stops, electric buses or trackless trams) but this would be a very small impost relative to the current entirely underground heavy rail SRL. It would also provide a politically astute option to pause further expenditure on the SRL while the "road option" confirms the viability of the business case. In effect, it would be an extension of the highly successful but largely overlooked Smart Bus network.

We don't have the luxury of time to wait for funding to be available to de-carbonise the transport task. We do not have time to wait for SRL to be completed by 2050, or for that matter any of the other new heavy rail projects for which there is now no completion date this decade. With much lower capital investment, upgrades could be made to the SkyBus network serving Tullamarine Airport with electric buses and better utilisation of existing road space in that corridor, while opening up other corridors in the north and west where rail exists but accessibility to the airport by PT is very poor.

Similarly, mega road projects such as North East Link have shown how express busways can be implemented prior to car-based aspects – a re-scoping of this and other mega roads yet to open, such as the West Gate Tunnel as primarily bus and road freight corridors is timely. Strategic policy long before the advent of IV called for mode shift towards active and public transport on public health and environmental grounds; investment in new roads is only justifiable if it can be demonstrated not to increase or maintain car dependence, but instead, is needed to foster transitions to healthier, socially positive and environmentally friendly transport choices for all.

New thinking is urgently needed. Infrastructure Australia[1] reports that transport accounts for 19% of Australia's greenhouse emissions, second only to energy production. Unlike the reductions occurring in other sectors, the emissions from transport have increased by 60% since 1990. Recent research suggests that alternatives such as autonomous electric vehicles, while potentially reducing greenhouse emissions if limited to shared occupancy and ownership, risk a host of unintended consequences and, at this time, must be regarded as an unproven and highly risky strategy[2], especially since there are no guarantees that shared occupancy models will be adopted, or renewables will be the dominant source of power. Beyond the issue of emissions, there are serious questions about their impact on urban amenity and the ability of autonomous vehicles to be safely integrated with active modes of transport in ways that would not discourage the latter as transport choices.

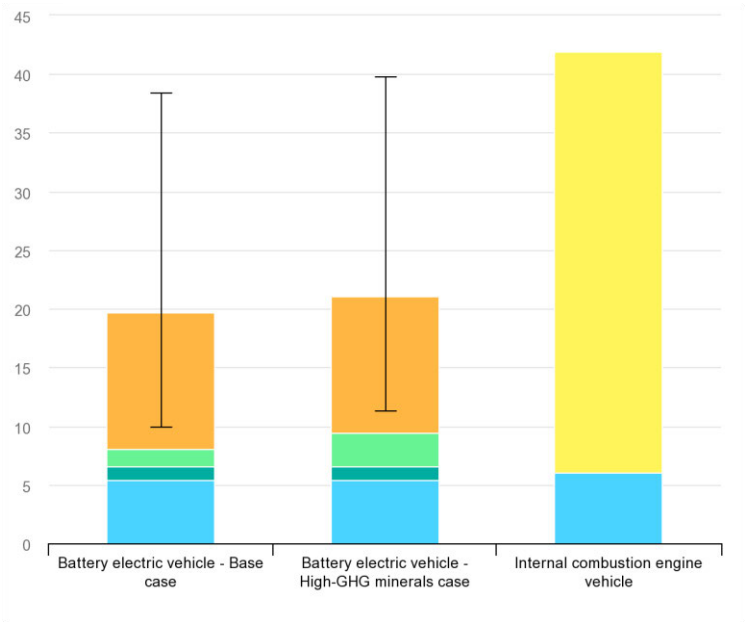
IV's 2021 strategy assumed the greenhouse gas challenge could be addressed through the accelerated purchase of ZEVs. Yet such a strategy ignores the whole-of-life impact of ZEVs and the implications of such a roll-out dependent on developing technology and assumes the required natural resources will be readily available within the required timeframes and cost imperatives.

Work from the International Energy Agency[3] illustrates that despite their name, ZEVs generate significant greenhouse gas emissions during their manufacture and for the production of electricity. A wholesale shift to ZEV may offer emissions benefits under ideal conditions, but in the Australian context, it will reduce but not eliminate GHG production, and nor will it address the many downsides of car-dependent urbanism unrelated to propulsion that arise from the negative social and public health effects associated with the least spatially efficient mode of transport so far invented.

In addition, IV could focus on the harmful impact of ICE powered commercial vehicles. IV could recommend government support for totally removing elderly commercial vehicles that pollute our inner cities, and support to transform the current fleets to renewable power sources.

[1] Infrastructure Australia, 2019. *An assessment of Australia's future infrastructure needs.*
[2] Ribeiro Pimenta, A., Kamruzzaman, M. and Currie, G. 2023. *Long-term effects of autonomous vehicles on the built environment: a systematic scoping review towards conceptual frameworks*. Transport Reviews, pp.1-35.
[3] https://www.iea.org/data-and-statistics/charts/comparative-life-cycle-greenhouse-gas-emissions-of-a-mid-size-bev-and-ice-vehicle

Figure 1: Comparison of GHG Emissions by Vehicle Type (Source: IEA)



Furthermore, the mass roll out of ZEVs increasingly appears dependent on the availability of minerals in unprecedented quantities, unless alternative technical advances reach rapid fruition. The Age[4] has reports that the "world needs to mine as much copper in the next 20 years as has been produced in human history – 700 million tonnes of copper – to meet the Paris Agreement climate goals, according to the International Energy Agency." The supply of other minerals and rare earths needed to support the roll out of ZEV is equally problematic.

Put simply, EV's are not such an obvious or straightforward panacea to Victoria's greenhouse challenges. A resilient strategy must adopt a multiple-pronged approach that provides fleshed-out scenarios and meaningful options to provide democratically accountable decision-making contexts that genuinely address the conditions of an uncertain future.

VTAG urges IV to view Victoria's auto-dependency as a severe and urgent problem in need of new ways of thinking. It follows that any credible strategy will limit and reverse the growth in auto-dependency and the associated environmental and social impacts while promoting alternatives that prioritise environmentally and socially positive modes of travel such as walking and cycling and lower impact modes, including public transport.

[4] https://www.theage.com.au/business/companies/hardcore-capitalist-rio-chair-defends-esg-zealots-20230504-p5d5is.html

A new approach

To give effect to this approach requires a very different methodology to assess infrastructure options than is reflected in current practice, including IV's 2021 Strategy. We note that the 2021 strategy[5] introduced "new modelling" "incorporating population, employment, transport infrastructure, land use planning and economics, so the most up to date evidence informs our recommendations". Notwithstanding the imperative to reach net zero within the life of the strategy this new modelling failed to establish emissions reduction as a crucial objective within the evaluation framework. A new methodology is urgently needed to address this short coming.

An appropriate methodology will prioritise modelling the whole-of-life emissions associated with the construction and operation of any new infrastructure projects. This modelling must include Scope 1, 2 and 3 emissions and address the transport-induced changes in land use patterns. Projects that fail to show a reduction in net emissions should be deferred as these are incompatible with the current strategy's objectives.

In this context, we recommend that the IV's strategy to "Confront long-term challenges" requires substantial revision. Infrastructure investment to support the market-driven roll-out of EVs needs to be assessed for its contribution to emissions reduction in a similar way to other investments as advocated above in recognition that EVs will be insufficient to reach net-zero given current technology (and will do nothing to address the non-emissions-related downsides of car-dependent urbanism)

The following sections address the actions VTAG believes will better match Victoria's immediate infrastructure needs. VTAG acknowledges that it doesn't have the resources needed to appropriately assess individual initiatives, and that our specific comments are, therefore a subjective view. Our intention is to draw IV's attention to matters that require a more detailed assessment.

[5] Infrastructure Victoria, 2021, *Major Transport Program Strategic Assessment Report*

Manage urban change.

VTAG supports the thrust of IV's 2021 Strategy including the integration of land use and infrastructure planning, the creation of thriving places, changing travel behaviour and the adaptation of existing infrastructure.

The following table highlights several matters that should be reconsidered in light of the current evidence.

IV 2021 Recommendation	VTAG Comment
33. Publish Victoria's transport plan	We note the Auditor General's findings6 that "DoT and its predecessors have not, over the past decade, demonstrably integrated transport planning and are yet to meet the Act's requirements for the transport plan". We note that DoT contends that they meet the requirements of the act through the preparation of multiple, disjointed plans. We would therefore propose that IV strengthen this recommendation by providing advice on the minimum requirements in terms of scope and content expected within a state transport plan as per Section 63 of the State's Transport Integration Act 2010.
42. Redesign tram routes	We support this recommendation and refer IV to our previous submission to the draft 2021 Strategy[7].
43. Active urban renewal with new trams links: Fishermans Bend	We note that the implementation of this project is now overdue and it is an important example of the integrated land use and transport development needed to address Melbourne's housing short through infill development.
46. Reduce bus and trams fares	VTAG **does not support** reductions in fares while there is continuing under-investment in public transport services. Public transport is already solidly subsidised especially for pensioners, seniors, students and disabled, and this is considered appropriate while there is ongoing overt and subvert public financial and regulatory support for private mobility. We would urge IV to address improvements to service quality and coverage as the priority for funding. VTAG **does not support the introduction of mode-specific pricing** as the multimodal fare structure is an attractive feature of Melbourne's public transport network.

[6] David Barry, 2021, *Integrated Transport Planning: Independent assurance report to Parliament,* Victorian Auditor-General's Office

[7] Mike Reece, 18th October, 2016, *Draft 30 Year Infrastructure Strategy Submission*, Victorian Transport Action Group

48.Appoint an independent transport pricing advisor	IV **has not demonstrated that the appointment of an independent advisor would bring any benefits**. There may be merit in an independent advisor with a boarder remit to investigate service deficiencies, investment decisions and equity in accordance with metropolitan and regional planning policies. .

Harness infrastructure of productivity and growth

VTAG generally supports IV's recommendations for shaping the transport network for better access, improving freight efficiency, aligning social infrastructure with delivery and planning for growth areas. We recommend that these recommendations require further review in light of the imperative for net-zero. For example, many freeways and tollways are proposed to improve freight efficiency yet are implemented in a manner that promotes auto-dependency generating additional congestion, which actually worsens freight efficiency. IV must recognise the mistakes of the past to chart a new strategy that will address today's challenges.

VTAG remains disappointed that IV has ignored the potential of a comprehensive approach to integrated transport planning and instead has singled out projects for earlier or later implementation. Any rationale for prioritisation appears to be based on population growth projections rather than modal shifts required to meet emissions reduction targets. An integrated approach to planning public transport as a network, utilising multi-modal network accessibility assessments to test different scenarios for service improvements as well as adding additional routes across all modes would provide a stronger sequencing rationale that could challenge the project-based focus that distorts the necessarily political aspects of infrastructure decision-making.

In the absence of the above framework as a more holistic guide, the following table highlights several matters that should be reconsidered in light of the current evidence.

IV 2021 Recommendation	VTAG Comment
57. Reshape the metropolitan bus network and introduce 'next generation' bus services	We draw IV's attention to our submission on the IV's bus study[8] and note that the needed bus improvements are more extensive than reflected in IV's 2021 recommendation.
66. Construct an outer metropolitan road and rail corridor	Construction of the outer metropolitan road corridor will further lock in the auto-dependency of the outer north and west. This recommendation must be reviewed and assessed, including any induced land use changes, against the imperative of reducing transport-related greenhouse gas emissions.
72. Prioritise and oversee infrastructure delivery in growing communities	This recommendation should be expanded to address the lack of public transport in growth areas. Consideration should be given to shift responsibility for growth in transport to the agencies responsible for land use development to

[8] Victorian Transport Action Group, 2023, *Get on board: Making the most of Melbourne's buses. Submission to Infrastructure Victoria*.

	ensure public transport services parallel development in the same way that water, power, sewage and roads are integrated with development. At the same time, the governance of growth area development to date is out of step with more recent strategic policy such as 20-minute neighbourhoods. IV should review governance arrangements that will ensure that growth area development can only proceed when residents can be guaranteed that 20-minute neighbourhood accessibility to the needs of daily life will be available from their first day. Furthermore, governance arrangements for growth area developments should ensure that implementation of PSPs meets the requirements outlined by VTAG to ensure emissions reduction relative to Business As Usual is achieved.
New – develop an integrated transport and land use plan for Melbourne's Western and Northern Regions, with a focus on realising the potential already identified in strategic plans for centres such as Sunshine and Broadmeadows, etc.	Following the logic of VTAG's proposal for a new approach to assessment of infrastructure planning proposals and projects, we draw IV's attention to the urgent need to review planning for the Western and Northern metropolitan regions. These two regions are the focus of Melbourne's current and future growth, yet planning for them as cohesive urban regions able to meet the aims of even recent updates to *Plan Melbourne*, let alone more ambitious (but needed) plans premised on meeting the challenge of human-induced climate change has not been undertaken. We urge IV to establish a broad-ranging review of these regions' planning and governance frameworks with a view to implementing new approaches designed to ensure development that will produce net zero urbanism in existing as well as the brand-new communities that will form the majority of the built environment by 2050. In accordance with the above, we draw IV's attention to VTAG's recent report on the potential for Sunshine to be developed into a major CBD to bring productivity and job growth to the Western region. Sunshine is currently the focus of numerous but disjointed strategies (NEIC, Airport Rail Link, Western Rail Plan, MM2 and station redevelopment) which requires an integrated approach to urban planning, infrastructure design and development premised on achieving net zero as advocated above. In a similar manner,

	Broadmeadows has long been identified as a CBD but has yet to receive the right kind of attention for its potential to be realised in relation to the northern region

Develop Regional Victoria

Regional Victoria has challenges distinct from the issues of metropolitan Melbourne. VTAG generally supports the thrust of IV's 2021 recommendations.

The following table highlights one matter that should be considered in light of the current evidence.

IV 2021 Recommendation	VTAG Comment
83. Redesign regional public transport to meet local needs	• This recommendation should be expanded to include regional connections between centres such as Geelong - Ballarat, Bendigo- Ballarat, Latrobe Valley towns/cities as well as with Melbourne. VTAG notes the lack of specific actions suggesting work is needed to identify the transport needs of regional Victoria and to develop the appropriate mobility strategies. • We would draw IV's attention to the work being undertaken jointly by the Rail Futures Institute and the Town & Country Planning Association Inc. on the role of ***Rail as a Catalyst for Regional Growth***. Note: IV will be familiar with the associated Discussion Paper released in January 2022. The final report will be released around the end of June 2023. To view the paper and associated materials, visit: https://www.railfutures.org.au/category/passenger-rail-regional-growth-dp/ or https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/