



**Brisbane Central Business District Bicycle Users Group –
CBD BUG**

GPO Box 2104, Brisbane 4001

Paul French: 0423 974 825 (m) or paul.french@cbdbug.org.au

Leslie Martin: leslie@cbdbug.org.au

Sebastian Tauchmann, 3224 8491 (w) or sebastian.tauchmann@gmail.com

www.cbdbug.org.au

The Coordinator-General
Attention: EIS Project Manager
Northern Link Road Tunnel Project
Infrastructure and Economic Development Group
Department of Infrastructure and Planning
PO Box 15009
CITY EAST QLD 4002

Dear Sir or Madam

**Submission regarding Northern Link Road Tunnel Project
Environmental Impact Statement (EIS)**

Introduction

The Central Business District Bicycle User Group (CBD BUG) welcomes the opportunity to provide input on the proposed Northern Link road tunnel project.

The Brisbane CBD BUG is an organisation of city cyclists, representing and articulating the interests of the very large number of Brisbane residents who commute or ride bicycles to, from and within the Central Business District. The group has in excess of 300 members and potentially represents several thousand regular cyclists with a diverse range of ages, abilities and needs. CBD BUG members meet monthly to discuss issues of concern and interest to CBD cyclists. Facilities and safety for cyclists, and safe, direct cycling routes in and out of the CBD are issues of major interest and concern to our members.

As outlined in our submission on the Terms of Reference earlier this year, CBD BUG has serious concerns about the project as proposed. Our concerns are both at a broad level, in terms of the negative impacts of promoting even greater car dependence, and at a more specific level, in terms of concrete impacts the project will have on our members and other cyclists.

Traffic increases

One of the most remarkable impacts of the project identified in the EIS is the sheer volume of additional traffic it will induce on our roads. From the figures given (in Table 5-24, and in Table 5-31), the tens of thousands of extra trips induced every day by the tunnel are roughly a third of the total number of trips predicted through the tunnel. This promotion of such a significant increase in (primarily) car use directly conflicts with virtually all of the planning instruments identified by the EIS in section 11.1. While it does admit that in some cases (e.g. the conflict with Brisbane City Plan 2000, conceded in s11.2.3), in others it is simply ignored (e.g. the conflict with the draft City Shape Implementation Strategy) and in no cases does the EIS offer any serious resolution of the conflict. As a result it is difficult to

see how from a rational, long term planning basis that the project could possibly be approved.

The reasons why this is of particular importance to CBD BUG are twofold. First, continuing to prop up Brisbane's existing addiction to private motor vehicle transport comes at the expense of reduced adoption of more efficient and sustainable transport modes such as cycling, walking and public transport. Second, increased traffic on the road network increases the danger to cyclists, and reduces the opportunities for providing dedicated cycle facilities or even sufficient space on the roads.

Related to this are the misleading claims in numerous places in the EIS (e.g. sections 2.1.3, 11.2.2, 13.3.2 and 13.4.2) that the project will "free up" road space in some parts of the study corridor and allow provision of dedicated cycle facilities. In fact, the EIS shows that traffic throughout the corridor will increase regardless of whether the tunnel is built (Tables 5-26 and 5-35). If such bicycle facilities cannot be provided now it seems even more unlikely that they will be provided in the future should the Northern Link Project proceed. If the proponent seriously believes its claims then it should commit to them. For example the project should include, as an absolute minimum, the restoration of bus lanes on Coronation Drive and the introduction of bicycle lanes on Milton Road.

Policy conflicts

The lack of cycling facilities on the affected sections of Milton Road and Kelvin Grove Road is an issue of particular concern, as both these roads (and other affected roads such as Frederick Street and Musgrave Road) are future principal cycle routes according to the SEQ Principal Cycle Network Plan (see section 11.1.4). This plan makes the proponent responsible for implementing bicycle facilities on these routes (see section 6.1 of the plan), but it appears that Council is not interested in meeting this obligation. Section 11.2.2 of the EIS states there is a need to ensure that cycle routes are "not compromised", but the proposed project makes the affected sections of these roads totally unsafe for cyclists, and destroys any possibility of useful provision for cycling in the future. The meandering footpaths shown in the project description in the vicinity of these routes are not acceptable substitutes for principal cycling routes. The proponent needs to clearly show how it intends to deliver these parts of the principal cycle network in conjunction with the project.

Further, the proponent's own policies require it to provide cycling facilities on the roads affected by the project. For example, the Transport Plan for Brisbane 2008-2026 requires it to introduce provision for cyclists on all affected roads where practical (page 49). Council has not demonstrated (nor even claimed) that it would not be practical to provide cycling facilities on these roads but, despite the large number of roads affected by the project, there is not a single new bike lane nor other provision for cyclists on any of these roads.

Similarly, the proponent's own Brisbane Active Transport Strategy: Walking and Cycling Plan 2005-2010 requires it to provide "priority to pedestrian and cyclist access and safety in all new infrastructure projects" (page 11) but the proposed project provides no such priority and removes existing provisions for access and safety. The Walking and Cycling Plan also defines a key policy that "where possible, bicycle and pedestrian facilities should be part of transport projects" (page 11). Again, Council has not demonstrated nor even claimed that it is impossible to provide these facilities. The Walking and Cycling Plan clearly states that "on-road facilities should be provided as part of road projects" (page 12), and requires Council to provide green bike lanes with traffic light activation loops at signalised intersections (page 17), none of which is proposed in the EIS. In fact the EIS does not even identify these planning instruments, their requirements, or the conflict between them and the project. The EIS needs to address these requirements and include quality cycling facilities on the roads affected by the project in accordance with Council's policies.

Connectivity impacts

In local terms, cyclists will be most severely affected by the changes on Kelvin Grove Road, Milton Road and Croydon Street. Although none of these roads is currently particularly cycle friendly, each of them currently has significant cycle traffic along it. This is partly due to the desire for convenient routes and partly due to the lack of viable alternatives. As pointed out above, both Kelvin Grove Road and Milton Road are also designated future principal cycle routes, but the project as proposed will make the affected sections of each of these three roads virtually inaccessible to cycle traffic.

For cycle traffic along these roads the biggest danger comes from additional turning lanes, merges and diverges on the left side of the carriageway, in which cyclists suffer a high risk of being killed or seriously injured by motor traffic crossing their line of travel. This danger is compounded by the high speed design of these treatments and higher traffic volumes as a result of the project. For example, based on the information presented in Figure 4-8 and section 5.6.12 of the EIS, northbound cycle traffic on Kelvin Grove Road will need to avoid traffic diverging to the left into the tunnel at speed, then negotiate the two new lanes connecting from Musgrave Road and the Inner City Bypass, then another lane of traffic merging at speed from the tunnel. This is exacerbated by the removal of the existing northbound bicycle lane on Kelvin Grove Road and of the designated bicycle crossing point of the lane merging from Musgrave Road. This is an important route because it is one of the few commuter cycle routes connecting the CBD to the northern suburbs. The other roads above suffer similar impacts from the project.

To mitigate these impacts, the project should replace high speed merge and diverge slip lanes with lanes that connect to the intersection proper (and are therefore governed by normal traffic signal and give way rules), put merge and diverge lanes on the right side of the carriageway where possible, retain existing and provide additional explicit cycle crossing points on any remaining left side merge and diverge lanes, use green cycle lanes in the vicinity of any turning lanes, use bicycle storage boxes or advanced stop lines at signalised intersections, and generally provide safe and convenient on-road cycle routes along the affected roads.

The EIS does not address these impacts. Section 5.6.12 is supposed to identify the impacts of the project on active transport but, with the exception of the bike lanes on Sylvan Road, does not even reflect the reality that cyclists ride on-road. The EIS seems to expect cyclists to instead use nearby footpaths that are completely inappropriate. For example, based on the information presented in Figure 4-6 and section 5.6.12 of the EIS, north-westbound cycle traffic on Croydon Street attempting to reach Morley Street will need to wait for as many as five or six cycles of the traffic signals in order to reach the far side and rejoin the road. Motorists on the road will continue to enjoy crossing the intersection in a single traffic signal cycle, as cyclist do now. This is an important route because it connects the Bicentennial Bikeway to not only the Morley Street and Gregory Street precinct but also the residential area beyond the cemetery, around western Birdwood Terrace. The other roads above suffer similar impacts from the project.

For cyclists who prefer to use footpaths, the project should retain direct signalised crossings (e.g. across Milton Road at the western side of the intersection with Croydon Street, and across the northbound tunnel exit onto Kelvin Grove Road), avoid staged crossings (e.g. the one proposed across Milton Road at the eastern side of the intersection with Croydon Street), use pedestrian-priority zebra crossings across turning lanes (including any remaining merging and diverging lanes), use bicycle lanterns at signalised crossings to allow cyclists to legally ride on them, not resort to tortuous zigzagging and unnecessary hill climbing (e.g. as proposed in the crossing of the tunnel portal at Kelvin

Grove), and generally provide safe and convenient off-road cycle routes across intersections on the affected roads.

Cycle traffic across Kelvin Grove Road, Milton Road and Croydon Street will also be seriously impacted by the project. The addition of central medians, walls and numerous traffic lanes will make crossing these roads very difficult and dangerous, if not impossible. The project should include additional crossings at grade between Cadell Street and St Osyth Street and between Bayliss Street and the unnamed lane opposite, new grade-separated crossings between Gregory Street and Quinn Street and between Musk Avenue and Upper and/or Lower Clifton Terrace, and extend the existing overpass of Kelvin Grove Road from Normanby Terrace directly to Lower Clifton Terrace.

Construction impacts

The impacts of construction are a particularly sore point for CBD BUG, which has had an inordinate amount of its time spent dealing with the massive construction impacts of other major road projects, particularly the proponent's other TransApex projects. These have been calamitous for cycling but seriously understated by the proponent until they became apparent as construction commenced. This project appears to be following the pattern of previous projects by glossing over the severe impacts construction will have on cyclists.

The EIS says very little at all about the project's construction impacts on cyclists and how they will be mitigated. It gives no indication as to the expected shoulder closures, narrowed lanes, or other problems cyclists are likely to face during construction. The project should ensure that cyclists are considered in all works and that shoulder closure and lane narrowing is avoided or at least kept to a minimum.

In section 5.7.7 the EIS casually mentions that some paths (such as the heavily used Western Freeway bikeway) will be "realigned", as though that is as simple as picking a quiet time and dragging the concrete across. In reality this is the permanent closure of the existing path and construction of an entire new path, which will involve significant excavation (possibly including blasting) and other major earthworks immediately adjacent to the existing path. The EIS also claims that the bikeway at the corner of Sylvan Road and Jephson Street will remain operational throughout construction, which is doubtful given that Figure 4-6 and Chapter 14's illustration of vantage point TC6 clearly show the new ramp structures directly overhead and a large support column immediately adjacent. Experience with other construction projects indicates that this is very likely to cause prolonged closure of the affected paths during construction. The EIS needs to be clear how it will avoid such closures. In the cases where the EIS admits the potential for closures but uses vague words to describe them, it should quantify the closures in terms of frequency and duration.

Similarly, in section 5.7.7 the EIS admits possible, temporary realignment of the Victoria Park bicycle path near Victoria Park Road, implying that permanent realignment is not necessary, but Figure 4-10 shows that the tunnel exit will be where that section of the path is currently located, and that the path will be moved further north. This permanent change is not identified in the EIS.

In other cases the EIS describes seemingly totally unnecessary changes to bicycle paths. For example section 5.7.7 states that realignment of the bikeway on the southern side of the Inner City Bypass will be required, but it is on the other side of the train line from any other works described in the EIS, and there is no impact on the train line identified. The EIS does not describe the nature of the realignment. The EIS needs to provide more explanation about why such works are necessary and what they will involve.

Where bikeways are realigned there is a significant opportunity to enhance the cycle network by building new paths wider than the paths they were replacing. For example the Western Freeway bicycle path is currently around 3.0-3.5 metres wide but, as usage continues to increase, a 4.0 metre path would be more appropriate. This will be much more costly to do later (as evidenced by the current works to significantly widen the Bicentennial Bikeway) and would involve considerable additional disruption that can be avoided by building the new (realigned) path with an appropriate width up front.

The project should also ensure that the new (realigned) path along the Western Freeway does not have any steeper grades or longer climbs than it does now, nor than the road does. The existing freeway and path are cut through several hills (for example near the end of Broseley Road and Elizabeth Street) and there is a concern that the proponent might try to save money by not cutting the path in as much as the road. The EIS does not give any assurance on this issue, but it should.

Proposed mitigation

The cycle-related mitigation measures proposed in Table 20-2 and Table 20-3 of the EIS are underwhelming, especially in relation to the scale of the project and its impacts. Each proposed measure is addressed below.

The bicycle path to the Botanic Gardens from the bridge being built by Main Roads is important but is already committed as necessary work in conjunction with the Main Roads project.

The proposed off-road bicycle facilities along Sylvan Road make little sense. Sylvan Road already has adequate on-road bicycle lanes and, while the choice between on-road and off-road facilities is always desirable, it is difficult to see how off-road facilities can be added without major works beyond what is implied by the EIS. The number of side streets also makes off-road facilities on Sylvan Road less attractive. Instead, the project should widen the existing bicycle lanes and/or remove or relocate the existing car parking (so as to reduce the risk to cyclists from car doors) and introduce storage boxes at the Croydon Street intersection to cope with the large volumes of cyclists using the road.

The crossings of Dean Street and Miskin Street are currently significant problems in need of urgent attention, but Council is already conducting work to improve them and the connection between them. It reports significant limitations in its ability to deliver improvements, particularly on Miskin Street due to the proximity of the Frederick Street roundabout, and the EIS does not indicate that these limitations will be lifted as a result of the project. If there exists the possibility to make improvements beyond the minor improvements already in progress, they would be highly desirable and the EIS should detail them.

A better connection along Milton Road between Croydon Street and Dean Street would be desirable, but the proposed path through Quinn Park suffers from safety issues due to lack of passive surveillance and in this regard is a regression from the current situation. It also suffers from the degraded connectivity at the Croydon Street intersection (specifically, the removal of the western signalised crossing and the additional stages on the other crossings). The project should ensure there remains a suitable path at road level and/or an on-road bicycle lane.

The proposed "re-establishment of signalised pedestrian crossings of Milton Road and Croydon Street" does not seem to be a mitigation measure at all, but reinstatement of existing conditions. As noted above, the utility of crossings at this intersection will in fact be significantly degraded by the project. Bicycle lanterns on the signalised crossings will be

necessitated by the decreased ability of cyclists to use the intersection on the road, and should be included in the project.

It is unclear what is meant by "support pedestrian crossing with urban design and landscape treatments", so it is difficult to provide any meaningful comment. From the rest of the information presented in the EIS, the intersection changes will be to the significant detriment of pedestrians crossing.

Given the barrier effect of the project around Kelvin Grove, a link between Victoria Park and Spring Hill will be highly desirable, but it is unclear from Figure 20-4 exactly which link is being proposed. Such a link should offer good connectivity to Kelvin Grove Road and the Kelvin Grove Urban Village to the north, and to the recently constructed Normanby Pedestrian Cycle Link to the south.

Reinstatement of the path in Victoria Park does not appear to be a mitigation measure, but also a reinstatement of existing conditions. It should be considered mandatory for the project.

The proposed pedestrian link to Lower Clifton Terrace seems to be a minimal effort that will not provide a good level of service to either pedestrians or cyclists. A grade-separated crossing should be provided connecting Musk Avenue to Lower Clifton Terrace directly, and explicitly catering for cyclists as well as pedestrians. Bicycle lanes should be included in the works on Lower Clifton Terrace.

Ongoing consultation

As mentioned above, previous major road projects similar to this one have been (and continue to be) a major source of problems for cyclists. Many of the serious issues that arise are not covered by the EIS and only become apparent during construction. Often by the time they are evident to cyclists it is at such a late stage that it is difficult to have plans changed to reduce the severity of the problems. For this reason, should the project be approved, it is crucial that the proponent and its contractors engage in meaningful consultation with CBD BUG and other relevant organisations throughout the project, and particularly early in the planning stages. It is not sufficient to be notified of impending changes shortly before they are implemented.

Conclusion

The Northern Link project is a significant threat to cycling safety and connectivity. It offers at best a return to the status quo after construction in some parts of the network, and serious and permanent losses of designated future principal cycling routes in others. The proponent has done nothing to meet requirements for provision of on-road cycling. The proposed mitigation measures are either already in progress or deliver little or nothing to cyclists. While the overall justification for the project is highly questionable, if the Coordinator-General approves the project in any form the requirements outlined in this submission will help to reduce the severe impacts it will have on cycling.

Yours sincerely



Paul French
Co-Convenor
Brisbane CBD BUG

19 December 2008