

SUBMISSION ON THE F3 TO SYDNEY ORBITAL BACKGROUND REPORT

Introductory comments

STEP Inc. is a Ku-ring-gai based community and environment group which was established in 1979. Its main focus is the conservation and preservation of the bushland in the municipality of Ku-ring-gai, but the group also undertakes a range of education initiatives for local schools and community groups, and has an interest in urban issues such as planning for sustainability. The group has more than 430 members.

This submission is written in response to Sinclair Knight Merz's (SKM) *Background Report* on a proposed F3 to Sydney Orbital link. SKM have now released the 4 route options for an F3-Sydney Orbital connection. Three of the options (Blue, Yellow & Red) go straight under the Lane Cove National Park and would mean stacks (and access roads to stacks) in the National Park and Upper Lane Cove Valley bushland. The proposed options could also mean stacks in the vicinity of Turramurra schools and the Sydney Adventist Hospital.

The background report completely ignores environmental and travel impacts that would eventuate if this road were built.

The superficial nature of the Background Report, and its failure to support most of its assertions with detailed analysis and evidence, leaves the community with no faith that the very real transport issues facing us in the north and north-west of Sydney will be addressed in a way that balances economic, social and environmental factors. The report shows no commitment to the notion of sustainable cities, is inconsistent with the State Government's policy to reduce the growth in vehicle kilometers travelled and appears to be a cynical and arrogant exercise in promoting road building by the RTA.

There are a number of reports now coming out of transport policy institutes both within Australia and overseas that show that building roads exacerbates rather than alleviates congestion because it encourages more people to drive more often, and further. This issue of induced traffic does not appear to have been addressed by the Background Report at all.

STEP has a number of specific concerns that we address below. We wish them to stand as our submission on the Background Report. We first address our concerns about the community consultation process conducted, and then list our concerns with the report in relation to each of the planning and project objectives listed in the original feasibility brief. STEP will point out that this Background Report fails to present a route that will

- alleviate poor travelling conditions;
- improve local amenity;
- address freight reliability/long distance transport;
- minimise social and environmental impacts;
- provide opportunities for public transport; and
- be economically justified.

We also point out our utter rejection of the blue, red and yellow options, as they will impact on bushland to an unacceptable extent.

Poor, unresponsive and obstructive community consultation processes

Community consultation associated with this study has been superficial and has proven an inadequate forum for the community to have its concerns seriously considered. STEP was represented on the focus group which met at Pennant Hills three times. Most of the forums consisted of the consultants telling us their opinion, with restricted time for community comment, and frequent instances of the consultants refusing to respond to questions from the floor or to provide technical details after the meetings as promised.

None of the points raised in the position paper produced by STEP as a submission to the F3-Sydney Orbital study (which involved several months of thorough research and input from a range of expert professionals and industry bodies), were addressed by the consultants. Our five main recommendations and concerns were not addressed in any form, either in meetings, by letter correspondence, or in the background report. The points raised in the position paper were absolutely vital as considerations as to whether this road would provide the solution promised, and it is unacceptable that these issues were not responded to by consultants, nor by the Federal Government.

Concerns by Ku-ring-gai Council that residents in the municipality were given inadequate information and input, meant that the Council was forced to organise its own public meeting, at which 800 residents attended. SKM were invited to attend the meeting but declined, stating that they did not see any 'benefit' in attending such a forum. The refusal of the consultants to attend such valid forums, reveals a fear of engaging with the community and do not inspire trust or respect from those that will be impacted upon by the outcomes of this study.

In addition, and of grave concern, is the fact that there has been a deliberate withholding of documentation and technical information needed to support assertions made in the Background Report, and a reluctance to support assertions and 'findings' with any detailed documentation or studies.

This has led to a situation where the community that will be affected by the impacts of such a road are restricted in their capacity to make an informed response to the options presented. The Background Report is inadequate, providing no indication of where the information/data has been derived, no technical references, no strategic background or adequate justification of the project. As it stands, the Background Report does not fulfill the requirements of a development study as prescribed by the Environmental Planning and Assessment Act.

As a submission from a Wahroonga resident reads 'it is unreasonable for people to be expected to make intelligent comments on the basis of the inadequate information that has been provided within the very short timeframe proposed'.

Along with other residents and community groups local to the Wahroonga, South Turramurra and Pennant Hills communities, STEP demands that the community be given access to the studies that have been used to support the assertions of the Background Report including:

- traffic demand studies;
- economic evaluation;
- engineering considerations;
- corridor evaluation;
- macro network studies; and
- induced traffic impacts.

Traffic and transport issues – how the route options fail to address the project objectives

Four planning and four project objectives were identified initially to 'guide work undertaken in the study'. However the report fails to adequately address these objectives.

1. Alleviate existing poor travelling conditions

The Background Report states that Pennant Hills Road is currently 'at capacity' with 75,000 vehicles per day. It suggests that traffic will grow to 100,000 vehicles per day by 2021.. The consultants propose to build a \$2 billion 7 kilometre freeway link to relieve Pennant Hills Road. They then state that the new link will have 70-80,000 cars on it in 2021 – i.e. will be at capacity (many experts say that the link will be clogged far earlier than this in fact). Basically we will be exchanging one clogged, congested road for another.

There is now no doubt that the provision of more road capacity in urban centres exacerbates overall congestion by encouraging people out of mass transit and into the private motor vehicle, quickly obliterating any short-term easing of congestion. This phenomenon, called induced traffic, sees jumps in total traffic growth each time a major roadway is built.

Evidence that freeway links of the type proposed by SKM provide only short- term, band aid solutions to travel congestion, are evident all over Sydney. The M5 East was at capacity just one year after opening. Similarly, it took only 8 years for congestion to return to original levels after the opening of the Harbour Tunnel. *Like Los Angeles, we need to face the fact that we cannot build our way out of congestion.*

The Organisation for Economic Cooperation and Development, of which Australia is a member, wrote in its report on urban travel back in 1995 that 'large scale road investment is no longer seen as a solution' to congestion.

Unmanaged traffic growth is now costing enormous amounts of money and is impacting on the economic and environmental health of the city and surrounding regions.

Air pollution now costs Sydney \$300 million per annum, and congestion costs the city \$6 billion per annum. Once road deaths, air pollution, congestion costs and other externalities are taken into account, the road deficit for the country as a whole is a whopping \$22.8 billion per year.

As STEP advised in its previous submission, this proposal would see jumps in traffic growth from induced traffic (when the M5 East was built, the rail line along the same corridor lost 7% of its patronage). Facilitating and encouraging such traffic growth is contrary to NSW Government policy, which is to reduce total vehicle kilometers driven in the Sydney basin.

The Background Report also suggests that building a link road will improve road safety. However, building a tunnel to connect the F3 and the M2 will not improve road safety on the National Highway as it will simply encourage more people to use their cars. The obvious way to improve road safety is to reduce road usage by providing rail infrastructure. Rail travel is safer than car travel.

2. Improve local amenity

There no evidence presented *at all*, that traffic will not re-equalise on Pennant Hills Road. Pennant Hills Road will always be a busy, polluted arterial road, and to lead residents to believe otherwise is disingenuous.

The result of the proposed link road will be a facilitation of traffic growth with its associated problems of air and noise pollution and community severance. A far better approach would be to examine ways to manage the growth trends in transport, by providing mass transit that could absorb much of this growth, or implementing travel demand management strategies. Only by reducing vehicle usage will we achieve improved local amenity.

3. Improve travel reliability and serve the future growth needs of long-distance transport

It is STEP's opinion that constructing a 7km link road will be largely ineffectual in improving travel reliability and reducing operating costs of long-distance commercial and freight transport. As we have argued above, a link road will simply induce additional private vehicle use and thus not provide reduced congestion for commercial and freight transport. The Background Report provides absolutely no information on details of current and predicted vehicle usage, so it fails to make a defensible case that conditions for commercial and freight transport will be improved.

It is STEP's belief that the only sustainable future for commercial and freight transport is increased investment in rail infrastructure. State and Federal Governments have shirked their responsibility to improve the northward rail line which, states one expert, suffers from 'steam age alignments' which slow down trains and make the line north from Sydney uncompetitive with the road (which has had \$1 billion poured into it in the past 25 years).

The consultants admit in their report that 'Rail market share has been declining. If this trend is not arrested, the road network is predicted to be handling an additional daily truck flow of 42% in 2011 and over 100% in 2021'. We will *never* arrest this trend if we continue to pour huge sums of money into the road system while letting the rail system run down to unsafe and non-viable levels. This is not only irresponsible governance, but a failure to plan a city that operates efficiently and sustainably.

The 1997 Sydney Freight Plan estimated it would cost \$450 million to double the freight capacity by duplicating the rail line north – where is the evidence that the consultants have investigated the potential of this upgrade? The consultants are urged to investigate comprehensively the possibility that modal switches towards rail and from private motor vehicle could be achieved if a reasonable level of funding made rail a more viable alternative for commuters and freight.

4. Minimise social and environmental impacts

The report fails to adequately address a number of issues concerning social and environmental impacts. STEP wishes to make the following points:

- (a) The study implies that creek or river crossings will be cut and cover tunnels. Three of the four proposed routes involve creek or river crossings. Cut and cover tunnel construction

would cause disruption to water flow and aquatic ecosystems during construction. This is completely unacceptable to the local community.

- (b) The report is woefully inadequate on consideration of the impacts of construction, such that assessment of the four options is impossible. The environmental impacts of construction that MUST be considered are noise, dust, removal of spoil and associated traffic issues, disposal of spoil, work site locations and size, regenerated noise, effects on ground water and water quality (eg from treatment of water used in drilling operations). These details are required even in a strategic document in order to compare and assess options.
- (c) There is a potential for damage to bushland from drilling and investigative work. This would be unacceptable.
- (d) There is a potential for emission stacks associated with the tunnels to be placed in bushland or other open space. This would be completely unacceptable. Green space cannot be considered spare land - it is a valuable community resource.
- (e) The report makes no mention of potential impacts on threatened species or endangered ecological communities. This is unacceptable.
- (f) Vehicle emissions from stacks must be scrubbed for the finest particle size (<PM10) that can potentially affect human health. The argument that the effectiveness of such technology is unproven will not be acceptable. Instead we must adopt the precautionary principle as many other countries have done.

It is STEP's position that any detrimental impact of the proposed link road on urban bushland would be unacceptable.

5. Provide opportunities for improved public transport

Apart from a few motherhood statements about the need for public transport, the Background Report focuses solely on the feasibility of road responses to transport issues facing the area, rather than taking any integrated transport network approach. The report pays only lip service to the viability of improvements to rail and mass transit as part of an integrated approach and the potential for modal switch if these improvements and upgrades were made.

In the past year, the Central Coast high speed rail link, the north west rail link, and the Epping to Parramatta rail link have all been shelved or put off into the never-never. It is hardly surprising that mass transit has been unable to keep its modal share of commuter and freight flows.

A further comment regarding public transport considerations is to ask why public transport upgrades were not *fully* under consideration as alternatives to road expansion. The report's assertions regarding origin and designation data are unsubstantiated and STEP queries the origin of this data. The consultants claim that traffic flows along the corridor consist of a 'significant proportion of car trips with dispersed origins and destinations' (p6). This assertion is not substantiated. In fact, for the peak periods of the day, comprising mostly of 'journey to work' trips, 50% of Central Coast commuters travelling south on the F3 are heading to the four hubs of Hornsby, North Sydney, Parramatta, and the CBD. Improving mass transit connections to

these hubs to improve the modal split between rail and road has not been adequately investigated by the consultants and their assertions about 'dispersed trips' need to be substantiated by origin/destination data.

The fact is, a large percentage of vehicle commuter traffic coming down the F3 that heads out of two hubs (Wyong and Hornsby) (50% of traffic) and into one of four hubs (Hornsby, CBD, North Sydney and Parramatta) (50% of traffic). These trips have considerable potential for diversion to rail, if service and infrastructure improvements are focused on Main North, North Shore, and Central Coast lines. Much of the remaining traffic flow heads southward from Hornsby. There are currently no viable mass transit routes linking the north to the south and south west in this region, despite the government wanting to develop enormous tracts of land in this area in the years to 2021.

The report states that 'fortunately Sydney has a comprehensive rail network' (p 8) This comment is either extremely naive or totally ill informed. The Christie Report, commissioned by the NSW State Government in 2001, urged that the Sydney rail network was close to capacity, in a state of extreme disrepair, and required some \$20 billion worth of funding to provide our city with a functional rail network to serve the population into the coming decades.

Just one month ago, an Engineers Australia report supported such findings, urging that the rail network was in need of urgent repair and funds. The Engineers Australia report also called for the Government to resurrect the Sydney –Newcastle high speed rail project, promised to Central Coast commuters for years, and shelved last month. A high speed rail link would have offered a viable alternative to private vehicle for many of the 30 000 commuters that drive down to Sydney every day for work – and a long term, more sustainable option for travel into and out of the region.

In summary, the report is completely inadequate in its consideration of providing opportunities for improved public transport.

6. Economically justified and affordable

As discussed earlier in this document, there has been inadequate justification for the construction of a \$2 billion roadway compared with upgrades and improvements to rail. \$2 billion is an unjustifiably high price tag for a short- term '20 year lifespan' response. This project needs to be justified against costings for rail upgrades, or travel demand management programmes such as Travelsmart (see www.travelsmart.gov.au).

Until Sinclair Knight Merz and the Department of Transport and Regional Services can offer the community a clear indication that they have looked at the issue of accessibility needs in the north and north west as transport planners and not as road builders, STEP remains opposed to the construction of an F3 link.

While the Australian Government and SKM may lag several years behind world planners in terms of best practice, Australia simply cannot afford to continue catering for unchecked demand that has seen traffic growth in Sydney outstrip population growth three-fold. Players such as the Federal Government, and SKM need to catch up with countries overseas which are looking at ways of reducing the amount that communities need to travel to access jobs, goods and services.

Travel demand management programmes such as Travelsmart have now been implemented in every state in Australia except NSW. Travel demand management includes community education about transport choice, mass transit focused investment, and smarter planning for cities. Travel demand management, along with mass transit upgrades and distance charges for freight on roads, has the potential to significantly reduce the impacts and costs of congestion, and offer Sydney a more efficient and less environmentally damaging transport network.

Despite the fact that travel demand management is now regarded overseas as the only long-term solution to transport congestion and traffic growth, the RTA does not consider travel demand management approaches for the F3 until 2025.

Consideration of the proposed routes

STEP opposes all the proposed road options. In particular, the Blue, Red and Yellow options are completely unacceptable on environmental grounds. Even in tunnel form, the proposed Blue, Red and Yellow routes would destroy bushland for site investigations, and construction of tunnel exits and entrances, emission stacks and access roads for stacks. Emission stacks would localise and concentrate sources of highly polluted vehicle exhaust, and would have unacceptable detrimental impacts on the treasured bushland of the Upper Lane Cove Valley and surrounds. Specifically:

- Concentrated pollution sources such as emission stacks would impact on highly sensitive and much treasured vegetation communities and habitats along the Upper Lane Cove Valley. Remnant bushland that would be affected includes Threatened Ecological Communities such as Blue Gum High Forest and Sydney Turpentine Ironbark Forest.
- Localised pollution emanating from stacks would have negative impacts on fauna in the corridor, including mammals such as echidnas, brushtail and ringtail possums, sugar gliders and long nosed bandicoots, 17 frog species, 20 kinds of lizard, 2 turtle species and 172 bird species, as well as listed threatened species such as powerful owls and red-crowned toadlets.
- Preliminary investigations indicate that grades to achieve tunnelling under Lane Cove Valley would need to be greater than 8%. The consultants have told the community that the desirable grades for such a tunnel are 4%. A route along this corridor (the Red option) would therefore have to bridge the valley. The consultants know full well that the community is utterly opposed to such a bridge and would NEVER permit this to happen.
- The steepness of the grades of the Blue, Red and Yellow options would result in greater vehicle emissions, creating more pollution.
- All the road options impact on community facilities. In particular, the Red option impacts on two high schools, two primary schools, four kindergartens, Sydney Adventist Hospital, playing fields, shopping centres, a sports club and churches. This is unacceptable to the local community.
- The Blue and Yellow options would impact on the Sydney Adventist Hospital, which is unacceptable.

- All four options result in poor traffic and transport outcomes as discussed in the preceding sections. However the Yellow and Red options would simply direct more commuter traffic into the CBD, Chatswood and North Sydney areas, which are already suffering from current congestion levels. Further, these two options are based on poor traffic management principles, as a route headed south-east would mix freight transport with the commuter peak streams. Both the Red and Yellow options are unacceptable as they simply funnel more vehicles toward the CBD and do not achieve the stated objectives of reducing traffic on Pennant Hills Road and facilitating long distance and commercial freight.
- All four options currently proposed would have direct impact on properties in the vicinity of the end of the F3 and abandoned B2/B3 corridor, if the interchange and ramps for the tunnel commence south of the Pacific Hwy Bridge. This is contrary to both State and Federal commitments that the B2/B3 corridor has been abandoned. A number of residents bought properties in this area following these commitments and are currently investigating the legal implications for government if these commitments are not kept. These homes are also in Urban Conservation Area 26 identified by Ku-ring-gai Council for the beauty of their architecture and landscape.

Conclusion

STEP would be happy to submit an alternative proposal to the construction of road in our region. Such a proposal would include:

- Implementation of a Central Coast/Newcastle based Travelsmart programme (travel demand management).
- Construction of the long promised Sydney-Newcastle high speed rail.
- Investigation of the proposals put forward by the 1997 Sydney Freight Plan which quoted \$450 million for significant capacity upgrades (a doubling of capacity) for the main north line out of Sydney.
- A working party of transport agencies, environment and community groups and Federal Government representatives to look at ways of reducing travel need between Sydney and the Central Coast.

We would like to comment in conclusion, that a project of this magnitude requires a thorough consideration of impacts on communities, the environment and needs to show evidence of a long term vision for our city. One of STEP's members said at the time of our first submission that 'we need to stop planning roads and start planning Sydney'.

This statement holds as true today as it did last year when we submitted comments to the first round of community consultation. We owe Sydney's residents of the future more than ad-hoc non-integrated infrastructure projects. We urge the Federal Government and the consultants for this study to look holistically at the transport issues that are facing the north and northwest. We urgently need genuine solutions that incorporate notions of sustainable planning, planning for communities, and a genuine understanding of how transport planning for our sector must respond to the particular modal needs of long distance travel, as well as reduce the need for people to travel such distances.