

1st March 2021

Director - Transport Assessment, Planning and Assessment
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

**RE: Northern Beaches Link and Gore Hill Freeway Connection
Environmental Impact Statement (EIS)**

The Artarmon Progress Association (APA) welcomes the opportunity to provide comments on the Northern Beaches Link (NBL) – Gore Hill Freeway Connection (GHFC) Environmental Impact Statement (EIS). Given APA's remit is to promote the welfare, physical and intellectual advancement of the suburb of Artarmon our submission is focused on the Artarmon community.

The APA advised members of the EIS public consultation and exhibition period. Members were also invited to send their views to the APA to inform its submission.

The APA objects to the Beaches Link project until the following concerns are addressed:

1. Significant increases in traffic through residential and industrial areas of Artarmon
2. Environmental concerns, including the reduction of groundwater levels under Artarmon Reserve and Oval
3. Cycling and walking impacts on residents.

In this submission the APA offers some suggestions as to how to address some of these concerns and maximize the benefits of the project to the community. The APA would be happy to work with TfNSW to further develop each of the items proposed in this submission.

Yours faithfully,



Georgina Roussac
President

Concerns

The APA's concerns regarding the EIS are:

1. Increased traffic

Increased traffic through Artarmon local roads is an adverse outcome of the Beaches Link as critical main road connections are made via local roads (managed by Council) to the avoidable detriment of the local community.

As identified in the EIS and as shown in table 1 below, as the only other north shore entry/exit point for the Beaches Link is in North Sydney, Artarmon will experience an increase in traffic through both its residential and industrial areas as traffic heads to and from Reserve Road.

Table 1 – selected data BL EIS Tables 8.22, 8.23, 8.14, 8.15

Intersection	Do minimum				Do something <u>cumulative</u>			
	AM 2027		PM 2027		AM 2037		PM 2037	
	delay	rating	delay	rating	delay	rating	delay	rating
Reserve Rd/Gore Hill Freeway	61	C	55	D	60	E	51	D
Reserve Rd/Dickson Ave	14	A	73	F	27	B	95	F
Reserve Rd/Barton Rd	69	E	>100	F	85	F	>100	F
Pacific Hwy/GHF	29	B	29	C	25	B	29	B
Willoughby Rd/GHF	>100	F	38	C	10	A	11	A
Brook St/Warringah Fwy on ramp	>100	F	14	B	64	E	25	B
Brook St/Warringah Fwy off ramp	61	F	22	B	16	B	29	C
Brook St/Merrenburn Ave	>100	F	11	A	50	D	39	C
Miller St/Warringah Fwy on ramp	7	A	6	A	5	A	7	A
Miller St/Warringah Fwy off ramp	12	A	15	B	8	A	8	A

The APA asks TfNSW to investigate the following four suggestions for changes to the project to help reduce the increase in traffic through Artarmon, provide a wider range of western destinations and generally improve traffic flows:

1.1. Reserve Road / Gore Hill Freeway Intersection.

The project proposes an extra north-bound lane be added to the Reserve Rd bridge as shown in image 1 below.



Image 1 - Proposed Reserve Rd Works

It is not at all clear what the proposed lane configuration is, however APA believes the extra lane will allow a greater volume of traffic to turn onto the Gore Hill Freeway eastbound and onto the Beaches Link.

However, as indicated by the data for Reserve Rd / Barton Rd in the above table 1, southbound traffic in Reserve Rd would also benefit from an additional lane to reduce queuing at the Gore Hill Freeway intersection.

APA offers 2 suggestions as to how the performance of this intersection could be further improved and asks TfNSW to assess these:

Option A: Diverging Diamond without addition of additional lane

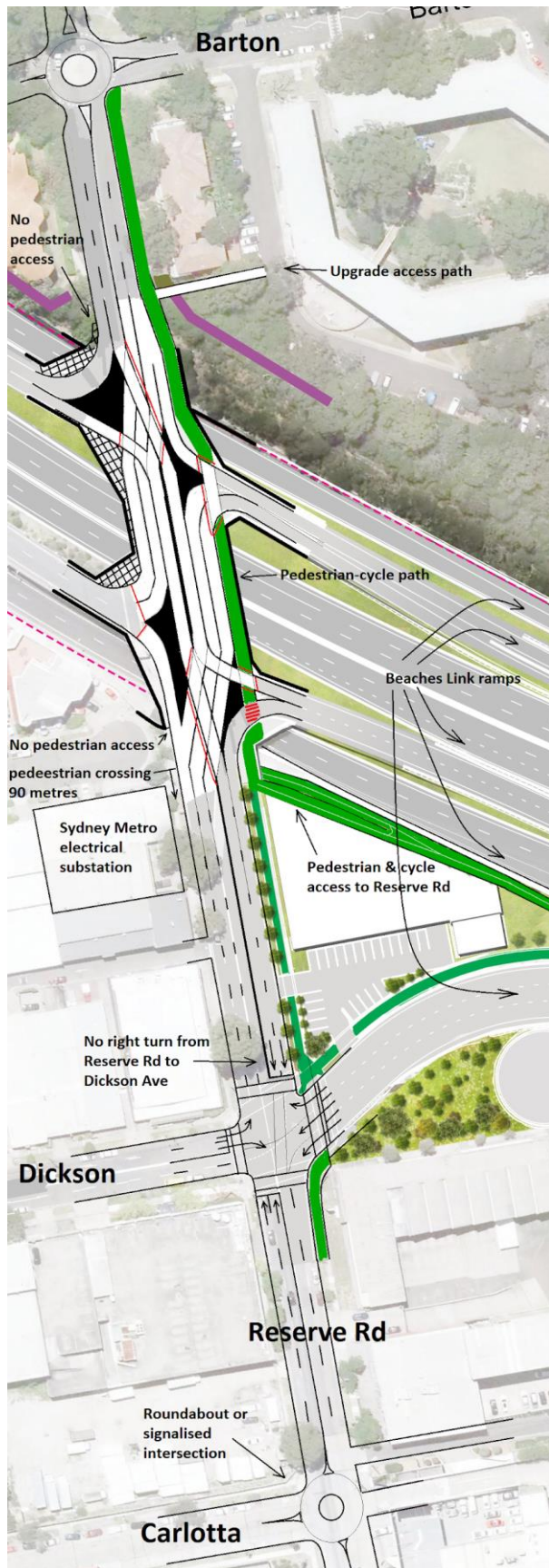


As shown in image 2, this concept is a reconfiguration of the existing intersection utilising a 'diverging diamond' to optimize the turning capacity from Reserve Rd onto the Gore Hill Freeway and Beaches Link from Reserve Rd onto the M2 and Longueville Rd. This option does not require the addition of an additional lane to the bridge so could be implemented immediately.

If performance of this intersection improved to the desired level, then it may be possible to avoid the need to add an additional lane as part of the project.

Image 2 - Concept: Diverging Diamond without addition of additional lane

Option B: Diverging Diamond with 2 right turning lanes



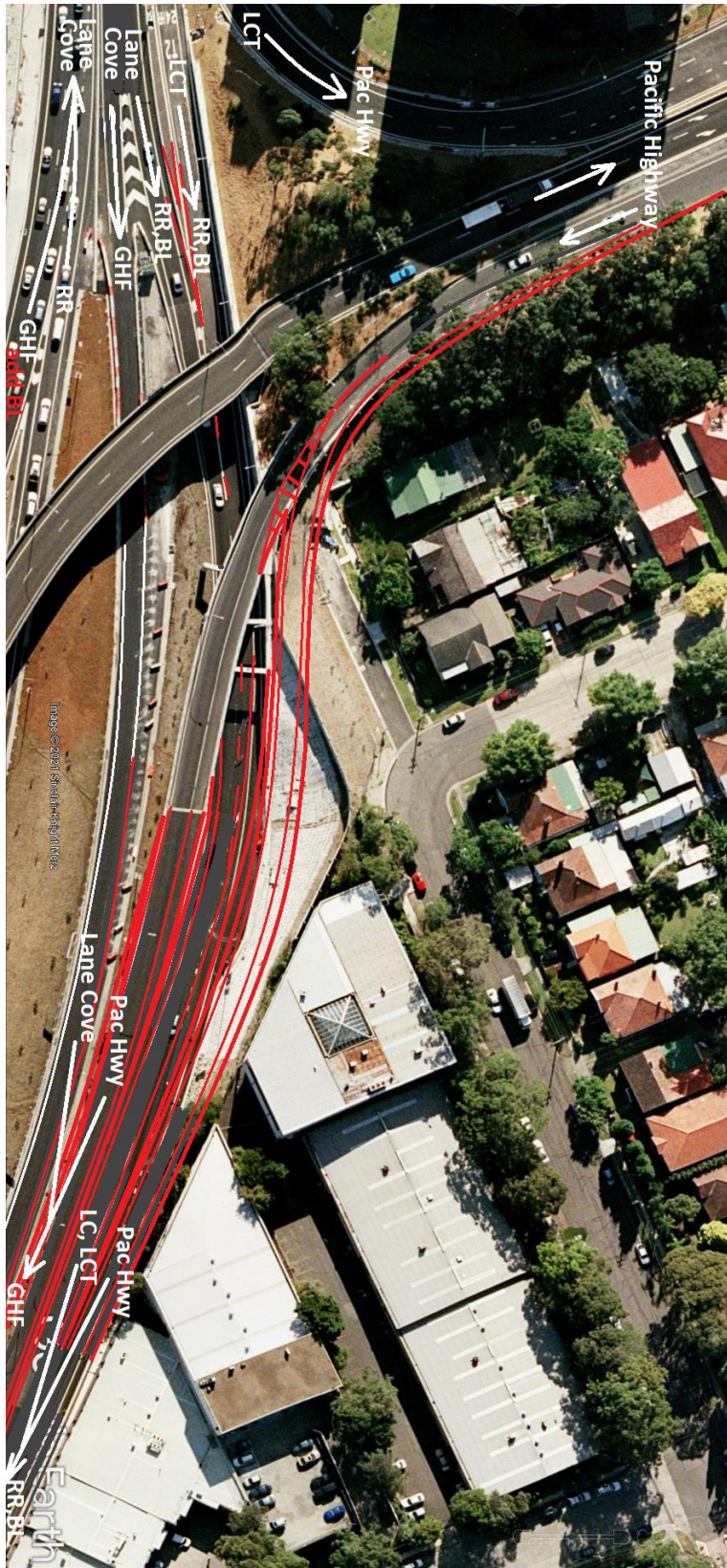
This concept, shown in image 3, allows 2 lanes of traffic to turn right from Reserve Rd onto the Gore Hill Freeway / Beaches Link eastbound and 2 lanes of traffic to turn right from Reserve Rd onto the Gore Hill Freeway / Longueville Rd westbound.

This option will provide significantly better performance and requires an additional lane to be added to the eastern side of the bridge and removal of the pedestrian-cycle path on the western side of the bridge.

In order to maximize southbound traffic flows on Reserve Rd and subsequently improve the performance of the Reserve Rd / Barton Rd intersection, APA suggests removal of the right turn from Reserve Rd into Dickson Ave westbound. Traffic wishing to access the industrial area would turn right at Carlotta St where a roundabout or traffic lights would be installed.

Image 3 - Concept: Diverging Diamond with 2 right turning lanes

1.2. Additional southbound lane from Pacific Hwy into Beaches Link



To improve the performance of the Pacific Hwy, APA suggests an additional southbound link lane be constructed from the Pacific Hwy to the Gore Hill Fwy which would allow access to the Beaches Link.

This is possible as per the image 4 to the left.

This measure, in addition to providing a right hand turn from Mowbray Rd West onto the Pacific Hwy southbound, would encourage traffic to use the Pacific Hwy rather than traverse via Artarmon village to access the Beaches Link.

Image 4 - Concept: Additional Connection from Pacific Hwy

1.3. Bifurcation of the Beaches Link exit ramp

Add a branch to the proposed Beaches Link exit ramp to the Reserve Rd-Dickson Ave intersection, to provide a direct link to the Gore Hill Freeway's Pacific Hwy & Longueville Rd exit ramp.

As outlined in red in the image 5 below, this link is parallel to the Beaches Link connection to the Lane Cove Tunnel. It would allow traffic to access either Dickson Ave or the Pacific Hwy & Longueville Rd exit ramp.

To facilitate this link, the Tier 1 pedestrian-cycle path is directed along the Punch St alignment to pass under the Hampden-Herbert road at the Taylor Lane underpass.

This measure reduces the 'cut & cover' tunnel length and likely to reduce costs. In addition it will reduce the increase in traffic in Dickson Ave which was never intended as an arterial road and has some current issues such as the 'four stop-sign' intersection with Clarendon Street which will need to be resolved.

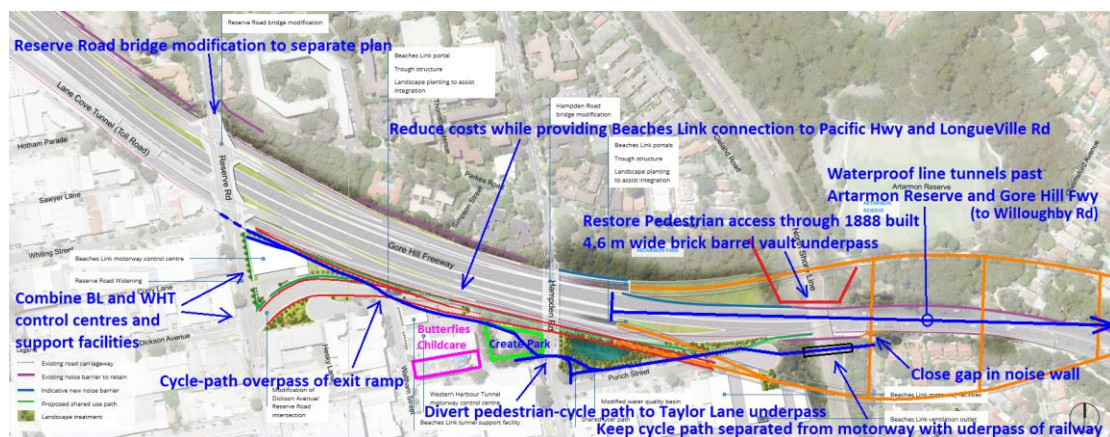


Image 5 - Concept: Bifurcation of the Beaches Link exit

1.4. Review Impact of Closure of Dickson Ave to Waltham St

Dickson Ave and Waltham St are currently used as a route between Reserve Rd and Herbert St. With the closure of this route, traffic may use either Taylor Lane or Frederick St as an alternative. Taylor Lane is completely unsuitable for any additional traffic and Frederick St is already busy and will become busier with the additional development planned for St Leonards and RNSH. APA requests the following changes be considered:

- Reopen Cleg St to Reserve Rd.
- Make Taylor Lane one way eastbound.

2. Environmental Concerns

The following environmental concerns resulting from the project have been raised:

- 2.1. Image 6 to the right, extracted from the EIS, shows the depth of groundwater draining by the proposed motorway 100 years after completion. It is about 8 metres less at the end of construction. If the tunnels get a "waterproof" lining, the groundwater draining is reduced by 8 metres. The EIS suggests lining the tunnels for the first 300 metres from the portal, but APA believes that 900 metres of lining (to Willoughby Rd) are needed to minimise the groundwater draining from Artarmon Reserve, Chelmsford Ave and Richmond Ave and the Channel Nine site.

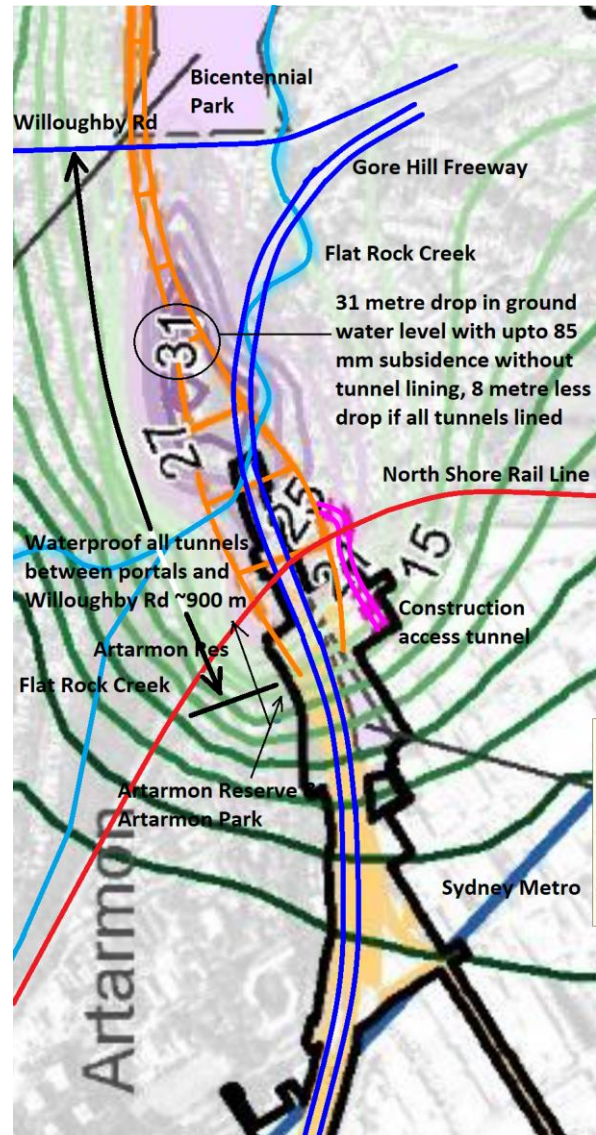


Image 6 - EIS Ground Water Levels

- 2.2. Whilst it is appreciated that free flowing traffic produces less pollution overall than congested traffic, there is concern that another ventilation stack in Artarmon, i.e. in addition to the Lane Cove Tunnel stack; is concentrating air pollution in Artarmon. APA requests ongoing monitoring of the air quality at key points in Artarmon, e.g. Artarmon Primary School and Artarmon Industrial Area, to ensure that there is no adverse health impact on Artarmon residents and workers. If air quality in the area fails accepted standards, then APA requests that filtration be installed on both stacks in the area.
- 2.3. With Flat Rock Gully Reserve proposed to be a central tunnelling site, concerns have been raised regarding the destruction of bushland,

contamination of soil and water in the area and the impact on fauna. The Reserve is currently enjoyed by many residents who enjoy walking or cycling on the shared pathways and is part of a wildlife corridor through the north shore. There are concerns that the EIS is deficient with regards to this area and that the risks associated with excavating in what was previously a landfill site have not been fully assessed. APA requests that a full assessment be made of the impact of the project on Flat Rock Gully Reserve and all measures be taken to minimise any impact.

- 2.4. Impact on Artarmon residents due to additional traffic and noise related to Barton Road West, Dickson Avenue and Punch Street worksites. APA requests all possible measures be taken to minimize this impact.

3. Cycling and Walking Impacts

- 3.1. The Beaches Link as documented in the EIS on public exhibition offers nothing for active transport on the Lower North Shore and will result in severe impacts on the existing shared paths and local amenity both during construction and possibly in operation.
- 3.2. Of greatest concern is the popular shared path alongside Gore Hill Freeway in Artarmon which provides a safe separated regional connection between Naremburn and Eastwood. The EIS states that this path will be closed during construction, which is estimated to take around 4 years, between Station Street, Naremburn and Reserve Road, Artarmon. This also breaks the local connection between neighbouring suburbs Naremburn/Artarmon and Lane Cove.
- 3.3. The document proposes an alternative route to divert pedestrians and bike riders along Station Street, Francis Street, Lambs Street, Cleg Street and Reserve Road. We know this is an extremely unsafe route, with already a high volume of heavy vehicles on a hilly road, before adding the heavy vehicles accessing the construction sites.
- 3.4. The EIS document downplays both the risk impact of the detour route and the significance of this shared path by:
 - Illustrating the detour route in the EIS document in Figure 8-12 as a version of the detour route with less hills and much reduced use of heavy vehicle Reserve Road than described in the text
 - Describing the detour in Chapter 8 (p8-47) as having a ‘moderate impact on pedestrians and a minor impact on cyclists, and would be managed by providing advanced notification to the community and appropriate line marking and signage’
 - Implying in Chapter 8 (p8-47) that usage is up to 150 pedestrians and cyclists in peak periods whereas this is shown in chart in Appendix E as up to 150 each hour over a number of hours – by far the majority weekday use is by bike riders
 - Failing to include any consideration of risks to pedestrians and bike riders on this detour in Chapter 23 Hazards and Risks
 - Failing to identify any access to the pathway at Reserve Road.

In summary, APA requests that any approval of the proposed Beaches Link ensure that access along the shared path remains continuous, safe and easy to use. Any necessary detour should:

- Be minimised to continue along the existing alignment wherever possible;
- Provide separation from vehicles, protection from heavy vehicles and to Austroads standards;

- Be included as part of the overall site design, rather than fitting around a predetermined site design;
- Be based on the final design of the path as much as practical;
- At all times be developed in consultation with the Artarmon Progress Association, Bike North and Willoughby council with timely notification of any adjustments;
- Provide an underpass of the railway line preferably connecting to Punch Street, so as to avoid steep hills and merging with vehicles on and around railway overpass road;
- Preferably provide an underpass of Herbert Street; and
- If detoured away from the shared path, connect directly back to the path from Waltham Street to avoid Reserve Road.

Who we are

The Artarmon Progress Association, Inc. (APA) was founded in 1906 as a not-for-profit group and our objectives are to promote the welfare, physical and intellectual advancement of the suburb of Artarmon and the City of Willoughby, to protect the interests of the residents, and to encourage a keener spirit of citizenship and mutual help amongst residents.

Our newsletter, the Artarmon Gazette, is distributed quarterly to over 5,000 homes and businesses in Artarmon. We regularly communicate with residents and act as a conduit between local residents and elected representatives on matters concerning our local community.