

**Making Cycling Better
in Northern Sydney**

BNA/GHF_2102006

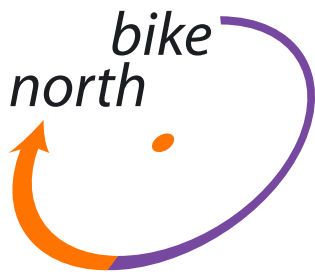
Director, Transport Assessment, Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022 PARRAMATTA NSW 2124

Dear Sir / Madam

RE: Beaches Link & Gore Hill Freeway Connection EIS application number SSI-8862 – Bike North Submission

Thank you for the opportunity to make a submission regarding the Major Project from Transport for NSW, '*Beaches Link & Gore Hill Freeway EIS*'. Bike North has many members who live, work, and do business on the Lower North Shore and surrounding areas, who will be significantly impacted by this project. We are a volunteer run bicycle user group with a membership of over 500 and affiliated with Bicycle New South Wales. We work with many councils in northern Sydney as well as with state government authorities, towards creating a bicycling friendly environment for all who want to use a bike for transport or recreation in northern Sydney.

In addition to this submission Bike North supports and provides a further level of local detail to the submission made by Bicycle New South Wales. Our submission focusses on the lower North Shore (Artarmon and Flat Rock work sites). We also support the submission by John Hawkins, who has provided details regarding the Northern Beaches sites.

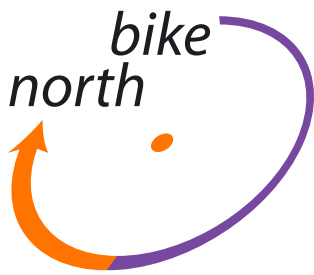


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Attached please find our submission in response to the EIS. Bike North is happy to discuss these issues with you further. The best Bike North representative for this purpose is Carolyn New (carolynn@iinet.net.au or 0427 018 516)

Yours sincerely,

Phillip Hart
President
Bike North
1 March 2021



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Summary

1. **Bike North objects to the approval of this proposal before there is full consultation with the key cycling stakeholders Bike North and Bicycle New South Wales.**

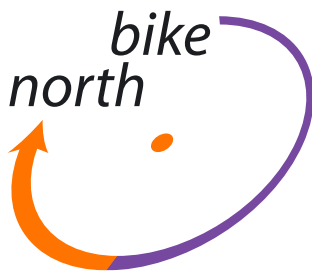
There has been a failure on the part of the project developers to consult with these key cycling stakeholders which is evident by the incomplete and inadequate proposals to address impacts on existing cycleways as documented in this EIS. The project team has already acknowledged in writing that they will need to reconsider their current plans for active transport. This is an acknowledgement of lack of consultation. **No approval should be made for this project until full stakeholder consultation has been conducted with Bike North, Bicycle New South Wales, and other local cycling advocates to identify and address all the cycling issues, including those raised in this submission.**

Bike North further requests that if approved, **conditions be placed on the project to ensure detailed on-going consultation on these cycling issues with the cycling stakeholders during all following phases of the project.**

Bike North further objects to the limited timeframe and timing for the release of this extremely detailed proposal. Community organisations are typically inactive over January, often not returning to their usual meetings and communications until well into February. The opportunity to communicate issues to the broader community is therefore extremely limited. Further time is required so the community is fully aware of the implications of the proposal.

2. **Bike North objects to the failure to include Bike North as a stakeholder for this project, despite our local expertise regarding bicycle facilities at Artarmon and Flat Rock worksites, our in-depth knowledge and appreciation of the issues from the lack of bicycle facilities between Naremburn and North Sydney and despite our inclusion as stakeholder for the Warringah Freeway Upgrade approval.**

Bike North recommends that our organisation be included as a stakeholder for the Beaches Link and Gore Hill Freeway Connections project.

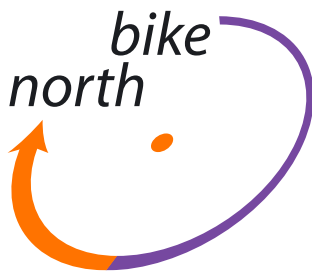


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- 3. Bike North objects to this proposal and recommends refusal.** Bike North objects both to entrenching private motor vehicles at the expense of public and active transport and to the scale and design of the Gore Hill Freeway expansion which will severely degrade and impact on the Lower North Shore communities, to no benefit, both during construction and after completion.
- 4. Bike North states that this EIS does not provide a full detailed business case to support this proposal over alternative complementary public and active transport modals.** Bike North objects to the lack of a full and detailed business case for alternative transport options to this preferred proposal to deliver another motorway. There is no plan in place for a citywide metro network which brings the entire city in walking or short bus or cycling distance of any metro station. Neither are there any alternative proposals for heavy rail options to access the Northern Beaches.

Bike North recommends that approval should not be given to this project without a full and detailed business case for alternative transport options.

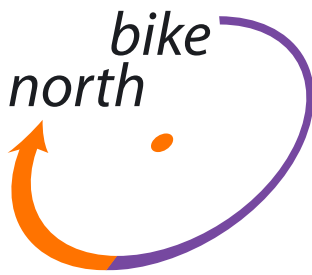
- 5. Bike North is concerned as to the separation of the two motorway projects ‘Warringah Freeway Upgrade’ and ‘Beaches Link’ in particular due to the cross over of projects in the Cammeray area.** We have already seen examples where projects have sought to avoid responsibility by “buck passing” issues at the boundary to the other project, landing issues in “no man’s land”. This is also resulting in lack of continuity and missed opportunities with works that span both projects. **We recommend that the geographic extent of both projects be better defined. We also recommend that consent include nominating a senior executive and the Active Transport group from TfNSW to be responsible for coordinating between the projects.**
- 6. Bike North objects to the failure to include any active transport improvement on the lower North Shore as part of this project.** Transport for NSW policy (CP21001) requires the provision of walking and cycling within the core scope of every transport project. In its public documents, the project trumpets improvements in cycle infrastructure at the Northern Beaches end of this project but provides none at the Lower North Shore end. Major opportunities for improvements in active transport on the lower north shore are missed (in part also because of the above boundary between this and Warringah Freeway upgrade).



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This specifically includes:

- **improvements to proposed new separated cycleway in the vicinity of the Artarmon Site near Herbert Street**
 - **the planning and delivery of an active transport corridor within the extent of this project.** As the Cammeray site is included within the project scope of this EIS, we recommend that **rectification of the gap in the cycleway between Naremburn and Cammeray** be considered part of this project, unless this rectification is completed prior to this project delivery, either as part of the construction of the Warringah Freeway Upgrade or any earlier Active Transport project.
7. **Bike North strongly objects to the severe impact during construction at the Artarmon Work Site to the high-quality cycleway alongside the Gore Hill Freeway by this proposal and the totally inadequate attention to provision of detour routes.** Bike North requests that prior to any proposal approval, **conditions be placed on this project to;**
- continue the pathway along the existing alignment wherever possible. Bike North believe that the existing works, particularly the ancillary works, can be redesigned to minimise, and maybe avoid entirely, the need for a detour.
- And if a detour is necessary;**
- Provide separation from vehicles, protection from heavy vehicles and to Austroads standards.
 - Included as part of the overall site design, rather than fitting around a pre-determined site design.
 - Be based on final designed path as much as practical.
 - At all times be developed in consultation with Bike North with timely notification of any adjustments.
 - Provide an underpass of the railway line preferably connecting to the existing path near Punch Street, so as to avoid steep hills and conflict with vehicles on and around railway overpass road
 - Preferably provide an underpass of Herbert Street
 - If detoured away from the cycleway, connect directly back to the path from Waltham Street to avoid Reserve Road



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Here is a link to a video which clearly demonstrates the difference between the current separated pedestrian and bicycle path and the dangerous proposed detour - <https://youtu.be/YHt94FnjNw0>. (If you require a copy of the video file it is easily available on request).

We also request that by the time construction is complete walkers and riders have returned to a continuous, connecting pathway at least to the current standard, with all railway and road underpasses and access routes of cycling facilities be minimised in impact. Such conditions should ensure that an equally safe, short, minimal time delay detour is provided for each cycling facility.

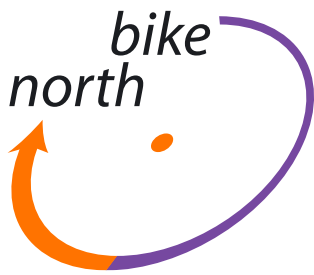
- 8. Bike North recommends that Beaches Link work on the Herbert St / Hampden St over bridge provide widening to a standard that integrates with the planned Chatswood to St Leonards active transport link.**
- 9. Bike North recommends that conditions of consent require minimum safety and access standards for paths in the vicinity of Flat Rock Reserve.**

Detailed Objections and Comments

1. **Bike North Objects to Failure to Consult with Bicycle Stakeholders in developing this Proposal**

There has been absolutely no consultation with bicycle stakeholders Bike North and Bicycle New South Wales concerning the cycling aspects of this project. This stands in huge contrast to other projects, including the Lane Cove Tunnel project where Bike North was involved in stakeholder consultation in every phase from Pre EIS Focus Groups through EIS, Detailed Design and Construction. During preliminary EIS broad community discussions the project team has acknowledged in writing that they will need to reconsider the active transport link. Also effectively acknowledging the lack of consultation to date.

The lack of consultation for this project has resulted in an extremely poor outcome for cycling in this proposal including:



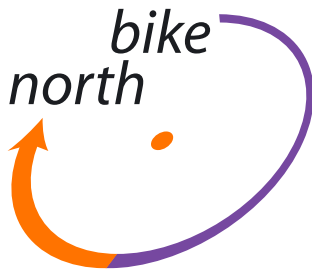
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- Failure to appreciate the high local and regional value of an existing cycleway alongside the Gore Hill Freeway
- Failure to design an appropriate detour route that suits the abilities and confidence level of those current pathway users
- Failure to appreciate the level of heavy vehicle traffic and inappropriateness of the detour route
- Failure to provide in concept a design that could possibly meet Austroads Standards and TfNSW Cycleway Design Toolbox Guidelines which clearly states that in Industrial Areas, *'Cycling facilities must be separated from motor vehicle traffic to reduce the potential for conflicts with heavy vehicles'*.
- Attempt to minimise the impact on bike riders by referring to the detour as having "minimal impact"
- Failure to recognise that this long, hilly and unsafe detour will significantly reduce usage of the this currently highly used active transport link,
- Failure to provide for cycling on the Lower North Shore as part of a transport project as per TfNSW policy CP21001

Bike North recommends that there be no approval of this project until this pre EIS stakeholder consultation with Bike North, Bicycle New South Wales and other local community groups is undertaken and these failures are rectified.

- 2. Bike North objects to the failure to include Bike North as a stakeholder for this project, despite our local expertise regarding bicycle facilities at Artarmon and Flat Rock worksites and the lack of bicycle facilities between Naremburn and North Sydney AND despite our inclusion as stakeholder for the Warringah Freeway Upgrade approval.**
- 3. Bike North objects to this project as a private vehicle road project and recommends refusal to this project.**

This project is a road project with the primary objective of moving more private motor vehicles in an attempt to address the increasing issues of traffic congestion. While to some this may intuitively seem the correct way to address traffic congestion, transport planners know that building more roads has very limited, if any, impact on reducing congestion and any improvement lasts for a short time. Motor vehicle usage simply increases to take up any added road capacity.



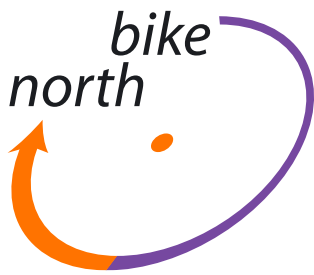
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The issues of transport for a megacity like Sydney can only be addressed through technological and behavioural changes in the way our society communicates, and a safe, hygienic, timely, efficient and reliable public transport network supported by active transport such as walking and riding bikes.

This proposal will reinforce and entrench private vehicle travel, which has already had a devastating impact on our city, through the damage it has wrought to our existing environment and to our physical and mental health both through poor air quality and by reduction in physical activity. Locally, the Warringah Freeway cut a huge swathe through the lower North shore during the 1960s and 1970s, dislocating thousands of people, destroying hundreds of homes and creating a huge canyon, separating communities and forcing numerous rat runs on local streets as people seek to reach their destinations on the other side of the divide. Naremburn itself has already been separated through three versions of motorways and this will be the second upgrade to the Gore Hill Freeway, after it was initially built. Each iteration of the motorway has widened the devastation and created more access issues across the motorway and still not satisfied the demand.

Sydney is rapidly becoming urban rather than suburban in nature, an even stronger argument for reducing reliance on private vehicles. The Lower North Shore is one area at the leading edge of urbanism in Sydney with an increasing number of residents and workers able to live without a car, relying on public transport, walking and cycling. Dependency on motor vehicles usage is quite inappropriate for urban areas and this motorway will be no benefit to the lower North Shore and yet it will have major negative impact to that community. There will be major impacts both during 6 years of construction and also once the motorway is in operation – forever. Impacts through increased air pollution from unventilated stacks, especially near public schools, resumption of green spaces such as the beautifully rehabilitated Flat Rock Reserve, major long term impacts on critical pedestrian and cycling access along the Gore Hill Freeway, restrictions on access to existing on and off ramps resulting in increased rat running through local streets and the inevitable increase in traffic on local roads, generated from the increased traffic induced by the additional capacity.

We can foresee that this motorway simply builds the ‘perceived need’ for more road projects, as the increased traffic generated will be seen as creating new congestion points at the Pacific Highway and Longueville Road. Building this road simply continues the cycle of road building that



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can never satisfy the demands of the motor vehicle. This is the point at which this cycle needs to stop.

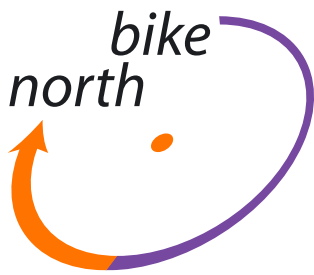
When reviewing the *Warringah Freeway Upgrade EIS* a year ago, our submission expressed a high level of concern regarding the impact on the existing, popular and high-quality pedestrian and cycling path along the Gore Hill Freeway in Artarmon. We also have some concern regarding the impact on the local shared path at Flat Rock Gully. Our fears have been realised by this *Beaches Link EIS*.

4. **Bike North objects to the lack of a full and detailed business case for a fully integrated public transport proposal as an alternative to this private vehicle proposal**

Bike North objects to the lack of a full and detailed business case for alternative transport options to this preferred proposal to deliver another motorway. While the business case now included in the EIS does include public transport, it is extremely limited in scope, merely including projects which are currently on the drawing board. There is no plan in place for a citywide metro network which brings the entire city in walking or short bus or cycling distance of any metro station. Neither are there any alternative proposals for heavy rail options to access the Northern Beaches. While suggestions are made that buses could use this motorway, this is not an adequate public transport system. *Future Transport 2056* has stated that buses are suitable as feeders to heavy rail or metro, not for long distance public transport. While buses are used at times for longer journeys, this is only suitable as a temporary option until a metro or heavy rail replacement. This proposal for private vehicle transport simply reinforces that type of travel and condemns our city to an unsustainable future with increasing traffic congestion and further road projects.

Additionally, existing experience does not indicate that buses are likely to use this motorway. Bus use of existing motorways is the exception rather than the rule. There is no evidence that this is likely to change and no evidence to suggest buses would use the Beaches Link Tunnel.

Bike North recommends that approval should not be given to this project without a full and detailed business case for alternative transport options.



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5. **Bike North has deep concerns that cycling issue and proposals will fall through the cracks due to the two stage Motorway development of the Warringah Freeway Upgrade and the Beaches Link.**

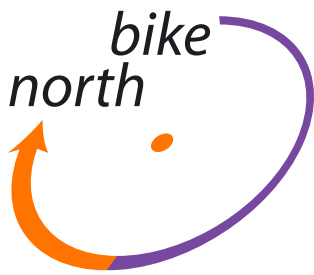
This proposal is second stage of a two stage development with the EIS for the Warringah Freeway Upgrade on exhibition a year ago and approval while this Beaches Link EIS was on exhibition.

There has been significant confusion during the exhibition with detail described in the EIS document and workshops run for the Cammeray area and yet questioning on information documented on active transport being dismissed as being 'not in this scope'. There is clearly a great deal of overlap between the two projects and Bike North has great fears that significant issues, including cycling issues and proposal may be lost between the two projects. Bike North asks, what measures will be taken to ensure a clear demarcation, but also coordination between the two projects and how will this be communicated to stakeholders such as Bike North. The conditions of consent must nominate who is responsible for coordinating between these projects so that no issues face "pass the buck" and that opportunities for projects that span the two projects are not missed. **Bike North recommend that the geographic extent of both projects be better defined. We also recommend that consent include nominating a senior executive and the Active Transport group from TfNSW to be responsible for coordinating between the projects.**

During public consultation, Bike North raised a number of issues with respect to the Cammeray area. These were previously referenced in our submission to the Warringah Freeway Upgrade EIS but also related to details provided within the Beaches Link EIS. As these were termed 'out of scope' by the Beaches Link project team, these have not been repeated in this submission but, these still remain outstanding issues for us. We need to be sure these will be adequately addressed by the developer of the Warringah Freeway Upgrade as they comply with the relevant Conditions of Consent.

6. **Active Transport Improvement**

The Beaches Link EIS highlights, both in its detail and in summary documents, the improvements to active transport at the Northern Beaches end of the project. However, it does not identify any improvement to Active Transport on the Lower North Shore. There are a number of opportunities for improvements, at minimal cost, that could be implemented with a little flexibility and breadth of thought. There is already great walking/cycling infrastructure along the Gore Hill Freeway provided as part of a previous motorway project. Unfortunately, the boundary of that previous



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project was at Merrenburn Ave, Naremburn and bike riders were abandoned in the middle of the motorway. For over 12 years we have been waiting for the older existing bike path, outside that scope, to be made safer, wider, with better protection from fast moving vehicles and a bridge overpass built to connect this cycleway to West Street, Cammeray.

This area is clearly within the geographical scope of the Beaches Link. **We therefore request that, if not already completed, this connection be built as part of the Beaches Link.**

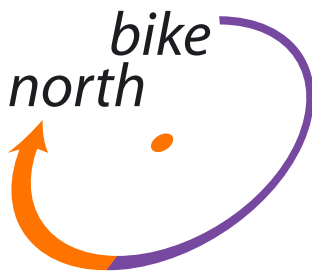
7. Bike North objects to the removal of the pathway alongside the Gore Hill Freeway in Artarmon without provision of a safe, separated and direct cycleway to Austroads Standard and TfNSW Cycleway Toolbox Guidelines and with protection from heavy vehicles.

The Beaches Link EIS states that the cycleway along the Gore Hill Freeway will be within the proposed construction zone and that pedestrians and bike riders between Station Street, Naremburn and Reserve Road, Artarmon will therefore need to detour for at least the period of four years construction. The EIS document has identified a detour route for pedestrians and bike riders, through the hilly and highly trafficked Artarmon Industrial Area, even proposing a route along Reserve Road with its high volume of heavy vehicles and other roads which are access routes to the Beaches Link work sites.

Here is a link to a video which clearly demonstrates the difference between the current separated pedestrian and bicycle path and the dangerous proposed detour - <https://youtu.be/YHt94FnjNw0>. (If you require a copy of the video file it is easily available on request).

We are deeply concerned that the Beaches Link project team has failed to understand both the high value and importance of the existing path and how inappropriate their detour route proposal is especially considering existing pathway users include families and less confident riders who have been attracted specifically to the traffic free pathway.

The construction program will see millions of dollars spent to adjust sections of the Gore Hill Freeway to allow cars to continue their usual route and level of service during construction. The Beaches Link project team has not given an equivalent consideration of path users to ensure that all ages and all abilities can safely and efficiently continue along the pathway for the duration of construction. Even the temporary ancillary works have been designed before pedestrians and



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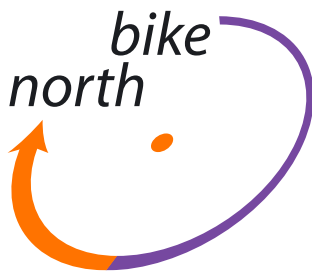
cyclists are considered, leaving the proposed detour unnecessarily long and over hilly and unsafe roads.

This pathway alongside the Gore Hill Freeway has high value both as a continuous, traffic separated long regional route between Eastwood/Epping and Naremburn and also for its safe, quick connections between Naremburn, Artarmon and Lane Cove. This section of the regional pathway underpasses the North Shore railway line and major roads including Herbert Street, Reserve Road and the Pacific Highway. There are many local connections into these neighbouring suburbs including a pathway and local road route to Chatswood itself and access to a major sporting and recreational centre at Bicentennial Reserve. All this, at a gentle gradient and traffic free. **This section of pathway connecting Naremburn, Artarmon and Lane Cove enables frequent, safe, local trips by people of all ages, the type of active transport that is prioritised by Transport for NSW.**

The proposed four year detour route includes a hilly climb on local roads in Naremburn, difficult, unsafe manoeuvring into a significant tradie, vehicular route over the railway line at the Lambs Road Bridge, unsafe mixing with impatient drivers / heavy traffic along Lambs Road and Cleg Street, then extremely unsafe riding along up and downhill on major heavy vehicle Reserve Road. The EIS document itself is contradictory and lacking in detail. It describes and maps two different routes through the Artarmon Industrial Area. It proposes returning to the pathway at Reserve Road, when there is no existing access. Further questioning of the project team does not give us confidence that they have given the needs of pedestrians and bike riders any consideration in the development of the Beaches Link EIS.

Cyclists and pedestrians using this path are major users of this transport corridor. This path is a major commuter route as well as providing local connections between local residential areas and commercial / sporting and leisure local destinations. The proposed detour is so dangerous and hilly that usage of this route will be significantly impacted. Thus, reducing the value of one of the most successful active transport links in the city. It is a high priority of the state to increase active transport, both commuter and local transport, and reduced use of this route will impact that active transport goal.

In summary we request that any approval of the proposed Beaches Link ensure that access along the path remains continuous, safe and easy to use.



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- Bike North believe that the existing works, particularly the ancillary works, can be redesigned to minimise, and maybe avoid entirely, a detour.

Any necessary detour should:

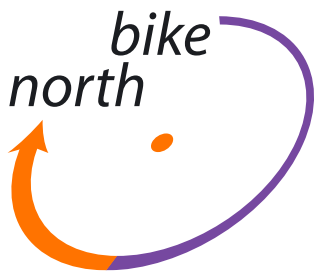
- Provide separation from vehicles, protection from heavy vehicles and to Austroads standards.
- Included as part of the overall site design, rather than fitting around a pre-determined site design.
- Be based on final designed path as much as practical.
- At all times be developed in consultation with Bike North with timely notification of any adjustments.
- Provide an underpass of the railway line preferably connecting to the existing path in the vicinity of Punch Street, so as to avoid steep hills and conflict with vehicles on and around railway overpass road
- Preferably provide an underpass of Herbert Street
- If detoured away from the cycleway, connect directly back to the path from Waltham Street to avoid Reserve Road

We also request that by the time construction is complete walkers and riders have returned to a continuous, connecting pathway at least to the current standard, with all railway and road underpasses and access routes.

8. **Bike North has concerns regarding impacts for pedestrians and bike rider at the Herbert Street / Hampden Road bridge overpass and recommends widening of this bridge to improve the proposed separated cycleway along Herbert Street / Hampden Rd which is currently under detailed design.**

The Beaches Link EIS indicates that there will also be impacts to the Herbert / Hampden Street bridge over the Gore Hill Freeway because of these construction sites at Artarmon. There is an existing shoulder lane bike route along this road which connects Chatswood to St Leonards, and we have concerns for the safety of bike riders and pedestrians using this route. **Construction needs to ensure the safety of pedestrians and bike riders in the vicinity.**

Willoughby Council is currently developing a detailed design, with funding from DPIE, for a separated cycleway along Herbert Road / Hampden Streets as a principal route connecting these



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two strategic centres, Chatswood, and St Leonards. The concept design received strong support from the community. This detailed design will provide a shovel ready project ready for construction, raising its priority for construction funding. This future cycleway will extend the value of the Eastwood to Naremburn Cycleway with the same high level of safety and separation. It will extend cycling access to schools, hospitals, and employment centres. The bridge is a pinch point for the separated cycleway. To avoid loss of parking, there is now a proposal to reduce the standard of the separated cycleway to shared path at this site. This could be avoided if the bridge were to be widened during the Beaches Link construction.

We therefore recommend that any works at this site should provide separation to ensure the safety of pedestrians and bike riders using the existing bike lanes and ensure that any construction at the Herbert Road / Hampden Street, Artarmon Site be widened to a standard consistent with the planned Chatswood to St Leonards active transport link.

9. **Bike North has concerns as to the safety of pedestrians and bike riders using the detour path alongside Flat Rock Drive and existing paths on Flat Rock Reserve as well as standard of that path and continuity of all existing access.**

The proposed worksite at Flat Rock will have impacts on the existing local pathways. While we appreciate there are plans to provide a detour path alongside Flat Rock Drive, we do have concerns that this will be to Austroads Standard and provide strong protection from fast moving vehicles, including the many heavy vehicles that will be access this dive site. We also have concerns as to whether continuous connections will be retained to both Small Street and to Sailors Bay Road connection to Northbridge. **We request assurance from the Beaches Link EIS that the detour will be safe with protection from heavy vehicles and provide access to all existing connections.**