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## **Brisbane Central Business District Bicycle User Group – CBD BUG**

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Project Manager – EIS Northern Link  
The Coordinator-General  
PO Box 15009  
City East QLD 4002

Dear Sir/Madam,

### **Northern Link EIS Terms of Reference**

I am writing on behalf of the Brisbane Central Business District Bicycle User Group (CBD BUG) to submit comments on the draft Terms of Reference for the Environmental Impact Statement for 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, potentially represents several thousand regular cyclists and meets 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.

The CBD BUG is deeply concerned about the proposed project and its environmental impact, primarily due to its role in continuing to reinforce Brisbane's dependence on private motor vehicles, and consequent increases in pollution, greenhouse gas emissions, respiratory disease, obesity, diabetes, economic and social vulnerability to rising oil prices, ongoing traffic congestion and loss of community. This submission seeks to ensure that these negative impacts will be clearly identified in the EIS, and that any opportunities for positive outcomes will not be lost.

The draft terms of reference require the proponent to identify alternatives to the project, but provide as examples only alternative major infrastructure projects. As has been widely pointed out elsewhere, trying to fight traffic congestion by building more roads is like trying to fight obesity by loosening one's belt. Any benefit is only temporary and exacerbates the underlying problem of excessive car dependence. Therefore the terms of reference should also require a comparative study of more sustainable and cost effective alternatives such as more transit, bike and bus lanes, congestion charging, park and ride facilities, development of mixed use communities, increased tolling, and other travel demand management and proactive mode change campaigns.

Further, comparisons to the "do nothing" scenario should be supplemented with comparisons to scenarios in which alternative efforts are made. Brisbane is one of the most car dependent cities in the world, so any opportunities to change rather than reinforce that dubious honour should be investigated thoroughly.

The description of the existing transport network should ensure that it describes pedestrian and bicycle movements not only on the few designated pedestrian and bicycle routes in the area but across the network. Not doing so would risk readers not realising their existence or the impact of the project on them.

The impact of construction on pedestrian and bicycle routes must be examined in detail. Previous TransApex EISs have glossed over these impacts but in practice they have been catastrophic for walking and particularly cycling, closing major commuting routes for months or years at a time, providing poor alternatives, and decimating numbers of users. Attempting to mitigate the negative effects of construction is a major ongoing task for the CBD BUG, and these effects were generally not disclosed in the relevant EIS, were understated, or the effectiveness of the mitigation was overstated.

It is important to recognise that of Brisbane's two major cycling arterial routes, the South-East Freeway route has been seriously adversely affected by construction of the NSBT (with a marked consequent decrease in cycling from the southern suburbs) and the Western Freeway route is at serious risk of suffering the same fate from the proposed Northern Link. The NSBT has also devastated cycling accessibility from the northern suburbs, the Airport Link looks set to compound this, and the Northern Link has potential to do even further damage. The Northern Link EIS needs to be very clear on how it will avoid repeating the disaster for cycling that the other TransApex projects have been.

More generally, the impact of construction on all affected parts of the transport network needs to be quantified and described to the level of changes to road shoulder width and availability, distance and duration of deviations, delay due to changes in number or configuration of signalised crossings, etc. These impacts tend to be overlooked by motorists.

On the other side, opportunities for public and active transport improvements should not only be identified but the specific ways in which they can be taken advantage of should be described, and specific commitments made to take advantage of them. The project proponent is also the authority primarily responsible for delivering any improvements, so it should be able to commit to them. This is especially important as the reduced surface motor traffic and related opportunities for improvements are one of the current selling points of the project. It would be all too easy for those opportunities to fall by the wayside further down the track, wasted as any available space is left for increased volumes of motor traffic to consume.

Claims about benefit to cyclists due to reduced surface traffic will need to be thoroughly explained in relation to the higher traffic expected on feeder roads, and the fact that those feeder roads are the same feeder roads as for the surface roads that are supposed to see lower traffic i.e. that cyclists will need to deal with increased traffic on the feeder roads in order to realise the purported benefits of the reduced traffic areas.

Additionally, the use of the tunnel by cyclists should be addressed. Cyclists are currently permitted on roads with few exceptions, so it is reasonable to expect that they will be able to use the proposed tunnel as well. Given that cyclists are more mobile in conditions of high congestion, any concerns about increased exposure would need detailed justification. The toll imposed on cyclists, if any, should be included in the project description to ensure the project's support for sustainable transport can be properly evaluated.

The study of the traffic effects of the project should be primarily concerned with helping to achieve government targets such as increased active and public transport trips and decreased car mode share. Where it cannot help achieve those targets it should at least assume that they will be met by other means, and not that the status quo will be maintained indefinitely. It should acknowledge that increased car dependence is not inevitable. Reaction to and reinforcement of trends for increased car usage contrary to accepted sustainable transport goals should be presented and assessed as a negative impact of the project.

Alternative scenarios should be explored in greater depth than the draft terms of reference contemplate. Although the effect of increased oil prices is mentioned, this needs to be studied in conjunction with the increase in public transport services that responsible government would provide, the conversion of road space to bus, bike or HOV lanes it would implement, the reduced demand for freight (given higher prices and possibly a contraction in the economy), and the move to more efficient and non-petroleum based forms of motorised transport (e.g. rail) for both people and freight. Increased emissions regulation (e.g. emissions quotas or a carbon tax) would likely also have similar effects.

The draft terms of reference incorporate induced demand in the traffic model but should further include quantification of the forecast induced demand, both in the new tunnel and on the rest of the transport network. It should be expressed in absolute terms and in terms of the volume of traffic using the new route. Expressing it as a proportion of the traffic volume on the overall transport network (as the proponent has on other recent TransApex EISs) is disingenuously misleading in downplaying the effect of induced demand. The terms of reference should also include an analysis of the cumulative induced traffic demand across all the TransApex projects. Calculations of emissions, vehicle operating costs should explicitly take into account the increase due to induced demand and the greater number of vehicle-kilometres travelled. The contribution of the project towards meeting government's mode share targets should also be quantified.

The terms of reference should include a study of the wider health effects of the project and its role in promoting greater car dependence. Direct effects would include increased incidence of respiratory disease, while indirect effects would include increased incidence of so-called sedentary lifestyle diseases such as diabetes, stroke and heart disease. These should include the cumulative effects of the other TransApex projects and be compared to the lower health costs of alternative programs to achieve a significant mode share change away from the private motor vehicle.

Similarly, the terms of reference should include a study of the wider environmental effects of the project's promotion of greater car dependence. This would range from

the local effects of increased pollution to the global effects of climate change. Again, these should include the cumulative effects of TransApex and be compared to the lower environmental costs of alternative programs to reduce our dependence on cars.

In the economic analysis of the costs and benefits of the project the EIS should not attempt to mislead by inappropriate rounding of the calculated values. For example, rounding a benefit of 5.8% over 45 years up to 10% (as was done in the recent Airport Link EIS) would be an unjustified distortion of the results.

Finally, the social effects studied should include the loss of sense of community or "place" caused by the increased traffic and infrastructure at the portals and on the feeder roads, and that caused by the longer trips and greater separation of work and home encouraged by construction of new urban motorways. Crash data should take into account the greater severity of crashes on higher speed roads and in tunnels rather than just the number of crashes.

Should you have any queries in regard to this correspondence, or wish to discuss the matter, I can be contacted on 3224 8491 (W) or by email on [seb@cbdbug.org.au](mailto:seb@cbdbug.org.au).

Yours sincerely

Sebastian Tauchmann  
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Brisbane CBD BUG  
30 January 2008