15 April 2005

Co-ordinator General
Att: Project Manager- North- South Bypass Tunnel
Project Delivery and Infrastructure Planning
Department of State Development and Innovation
PO Box 168
BRISBANE ALBERT STREET QLD, 4002

Dear Sir,

Re: RACQ Comments on North South Bypass Tunnel Draft EIS

RACQ appreciates the opportunity to comment on the potential traffic and transport issues both during and after construction of the North-South Bypass Tunnel (NSBT).

General Comment

The RACQ strongly supports the concept of by-pass and ring roads to provide means for motorists without an inner city destination to bypass the CBD. The Club's Transport Vision for South East Queensland, 2000 advocated:

> *Improve urban connectivity between major nodes by developing outer and inner ring road systems and building river crossings upstream and downstream of the CBD. This will allow traffic to bypass the CBD and reduce congestion on radial routes to the CBD.*

The RACQ therefore commends the Brisbane City Council for committing to the construction of at least part of that enhanced road system.

Given the growing magnitude of Brisbane's traffic congestion problem, RACQ firmly believes that addressing the issue is a responsibility of all levels of government, because the problem is a serious impediment to economic growth and is a matter of state and national, as well as local significance. Moreover, the Commonwealth and Queensland Governments, particularly the former, dominate vehicle-related taxation.

Therefore, the Queensland and Commonwealth Governments should provide realistic levels of funding to support BCC projects designed to relieve congestion, as well as committing to the planning, funding and construction of complementary congestion-relieving projects, such as completion of intermediate and outer orbital road networks.

It is disappointing to RACQ that Brisbane City Council finds it necessary to resort to tolls – in this case through a proposed Public Private Partnership (PPP) – to cover a substantial portion of the cost of the NSBT because of lack of support from other governments. Motorists already cover costs of providing roads many times over through state and federal vehicle-related taxes. Yet, they are to be asked to pay again through tolls.

All levels of government have neglected the important point that tolls on by-pass roads, such as the NSBT, undermine the congestion-alleviating potential of such roads. Tolls encourage road-users to stay on existing congested roads. In the case of the NSBT, more than 50 per cent of potential users of the new facility will stay on existing surface roads serving the CBD, according to a technical paper supporting the draft EIS. This means that both the new facility and other parts of the road system will be used less efficiently.

The greatest possible level of support by all levels of government for the NSBT is vital to minimise tolls to optimise the bypass's ability to relieve congestion in and around the CBD.

We acknowledge the Council's commitment to the tunnel approach. Therefore, this submission offers constructive comment and criticism, highlighting issues we believe will need to be fully addressed if the NSBT is to provide an effective tool for reducing traffic congestion.

One of the main issues to be addressed concerns the prospect of the location and scale of the NSBT serving to:

- significantly increase traffic volumes along existing radial arterial routes which are already heavily congested and have limited scope for any major capacity improvements; and
- force major traffic flows wishing to by-pass the city to share the same congested routes with city bound traffic due to its close proximity to the CBD and Story Bridge.

The Club's comments contained in the summary below and attached detailed discussion are based on information gathered from the NSBT website (EIS Chapter 5 – Traffic, February 2005), the NSBT CD, RACQ's 2004 Red Spot Survey and 2004 Travel Time survey, general knowledge of traffic conditions within the project area, comments from RACQ members, and analysis of available information.

Summary of Other Comments

Northern, Central and Southern Tunnel Portals:

The predicted increases in traffic volumes detailed in the EIS – Chapter 5 near all portal entries and exits in 2011 and 2016 are of great concern to RACQ without capacity improvements to the road network. The RACQ believes that intersection and road capacity upgrades are required at the northern, southern and central portals to better serve city bound destination trips as well as NSBT users.

A comprehensive system of advance guide signs and pavement markings will be required to provide clear and safe delineation of correct movements for traffic entering and exiting all portal locations to avoid conflicts with paths of vehicles at major surface intersections near portals.

Journey Times – Reallocation of Road Space

The RACQ notes with interest that some surface journey times will not improve even though a large reduction in traffic volumes is forecast for the surface road network between tunnel portals. This is related to a planned reduction in the capacity of the surface road network, a "tolling off" effect of more than 50 percent and inadequate capacity of the approaches to the portals.

The RACQ is concerned if the reallocation of general purpose lanes to other purposes including Urban Regeneration Initiatives as detailed in the document, 'draft environmental

impact statement… in brief', Table 8-1, p 59, or '*improved provisions for pedestrian crossings, improved provisions for turning traffic to assist with local access as well as bus priority measures.*' (EIS Chapter 5, p5-39) will contribute to an increase in predicted journey times for surface traffic. This approach would appear to ensure the surface roads remain as congested, if not more congested, to encourage the use of the tunnel and discourage use of free-access radial roads to the CBD.

The RACQ does not support any reduction in capacity of roads leading to the city and between the tunnel portals through reallocation of lanes from general traffic to high occupancy vehicles. The RACQ believes adequate funds should be allocated to upgrade the surface road network to accommodate additional traffic generated by the tunnel, as well as traffic growth arising from increases in population and economic activity.

Right to Left Lane Merges

The RACQ has concerns over the right hand lane tunnel entry and exit from the Pacific Motorway as well as the Shafston Avenue right lane drop. The RACQ believes that a left lane entry and left lane exit from the tunnel is safer and more readily accepted by motorists due to easier access for all traffic streams, less weaving manoeuvres, leaving the right lane free for overtaking and higher speed traffic and offering a common left hand exit.

Right to left merges should be avoided as they have created safety problems in the past, e.g., Logan Motorway / Ipswich Motorway interchange at Gailes and the Frederick Street / Mt. Coot-tha Road right turn ramp at Toowong.

Lutwyche Road

The RACQ is concerned about the forecast short-term safety and congestion impacts on the Lutwyche Road corridor if NSBT proceeds. It is understood that, at a later time, the NSBT - Stage Two (ICB to Stafford Road/Gympie Road) will serve to alleviate some of these congestion problems and provide a more appropriate bypass of the city and congested local areas.

The TransApex Pre-Feasibility Report indicates completion dates for NSBT stage one and stage two as 2009 and 2012, respectively.

It is essential to complete stage two of the project as a matter of priority.

Due to the forecast levels of service (LOS) at the Lutwyche Road/Newmarket Road intersection, consideration should be given to ending the inbound transit lane on at some distance prior to Newmarket Road, e.g., Granston Street. A study into the effectiveness of this HOV lane has shown that a T2 facility would operate more efficiently than the existing T3. For this reason the RACQ recommends that the T3 lane be converted to a T2 lane regardless of where it ends.

Shafston Avenue

The RACQ is concerned about the projected LOS at the Wellington Road/Shafston Avenue intersection particularly as there appears to be no mention of capacity improvements on connections approaching or departing this intersection. Other routes, e.g., Baines Street to Main Street and Stanley Street to Main Street, should be investigated to divert CBD bound traffic away from this intersection.

Haulage

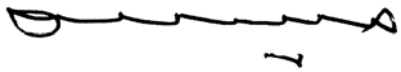
From information contained in RACQ surveys and general knowledge of road conditions, it is believed that all designated spoilage routes travel through heavily congested intersections and sections of road. Even though the spoil haulage trips will be restricted to only daylight hours, careful consideration should also be given to the volume of haulage trips scheduled for peak traffic periods. The RACQ recommends that there be very limited spoil haulage trips undertaken during AM peak (7:30am – 9am) and PM peak (4pm – 6pm) at all worksites. Deliveries to all three worksite should be similarly managed.

Construction Impacts

Lane closures should be kept to a minimum and preferably in off-peak or night operations. Road works, diversions and speed restrictions should be clearly signed in accordance with the Manual of Uniform Traffic Control Devices.

RACQ looks forward to positive engagement with Brisbane City Council on the above issues and will monitor the progress and the project with interest, particularly in relation to traffic impacts. Please contact John Wikman (tel: 3666 9741), Executive Manager Traffic and Safety Department for any further details.

Yours faithfully,



Alan G. Terry
CHIEF EXECUTIVE OFFICER