



**BEECROFT – CHELTENHAM
C I V I C T R U S T
I N C O R P O R A T E D**

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SUBMISSION

by

BEECROFT-CHELTENHAM CIVIC TRUST

on the

Hills M2 Upgrade Project 09-0049

The Beecroft-Cheltenham Civic Trust (“the Trust”) **objects** to this proposal for the following reasons:

1. Noise

Noise studies undertaken during the environmental assessment process clearly show that noise levels in the vicinity of Beecroft and Cheltenham, particularly between Beecroft Road and Pennant Hills Road, already exceed the acceptable levels set out in the 1999 EPA (DECCW) publication titled *Environmental Criteria for Road Traffic Noise* and that the M2 Upgrade will significantly increase these levels. It is the Trust’s view that the proposals contained in the Environmental Assessment (EA) are not consistent with the noise objectives and criteria, and do not mitigate noise impacts in accordance with, that publication.

The principal issue which has long been raised by residents of Beecroft and Cheltenham regarding the M2 has been traffic, and in particular truck, noise. It has become an issue of major community concern. Prior

to the M7 being connected to the M2 in 2005, noise levels on the M2 were consistent with the 1999 EPA Noise Criteria (under 55dBA at night) and were acceptable to residents. However, following the M7 connection, noise levels increased dramatically mainly because of the very large increase in truck volumes. Unfortunately no new noise abatement measures were introduced along the M2 corridor before the M7 was opened and as a result M2 noise levels now exceed the 1999 EPA Noise Criteria by more than the allowed 2dBA (up to 58dBA at night) in many areas.

This noise is highly disruptive. It is not only affecting dwellings close to the motorway but also causing inconvenience to residents living further away. Residents immediately adjacent to the M2 complain that, because existing noise barriers are not of sufficient height, many truck exhausts, particularly those of the vertical stack type, actually discharge above the level of the barriers with consequent significant noise impacts. Those living further away have found that, because of the fact that the ground to the north of the M2 slopes up from the M2 corridor and the ineffectiveness of the existing noise barriers, they are also exposed to unacceptable noise levels. As the M2 is part of the main north-south road transport corridor through Sydney, these residents suffer 24 hour exposure to noise already. The Trust is concerned that the project will only exacerbate their problems unless compliance with the 1999 EPA Noise Criteria is required of the proponent and strictly enforced once construction is complete.

In addition -

- Road surfacing material must result in reduced vehicle noise. The present surfacing of the carriageways generates high levels of tyre noise, which can be avoided by the use of appropriate materials.
- Noise from viaduct expansion-joint transit must be avoided. Again, this problem is present now, but can be addressed through modern technology.

- Speed limits must be kept low to reduce noise and pollution. There is no real need for the speed limit on this part of the M2 to be set at 100kph; a level of 80 kph would be adequate and safer. Apart from any other considerations, peak traffic levels probably mean that a speed of even 80kph is in real terms unlikely to be achieved.
- The method of tolling should be altered now to a “pay as you go” system. The present system is inequitable, unlike distance-based tolling methods. Distance-based tolling has been shown to work on the M7 motorway, and all other toll roads in Sydney (and any that may be built anywhere in the State in the future) should be moved to such a system.
- The Trust considers that the proposal to remove the bus off-ramp at Epping is premature. Epping has not yet been fully planned, and is likely to become a major transport interchange in the future. To remove the ramp at this stage would be to remove what might prove to be a vital element in such an interchange.

2. **Effect on vegetation**

Loss of vegetation along the Beecroft - Cheltenham corridor will be significant, especially if the proposed temporary extension off Allerton Road for construction access is allowed to proceed.

An option would be to reopen the original access to the viaduct area off the eastbound carriageway adjacent to Pennant Hills Golf Course. This was constructed when the M2 was first built and has never been revegetated. It contains no significant trees and is vegetated only by weeds. It could be cleared and reopened as an access road, subject to a requirement for proper regeneration at the completion of the work. It would provide a very short access to the viaduct area without any of the impact on significant bushland which the Allerton Road proposal would entail.

Access from Allerton Road would require a new track to be built which would result in the loss of trees and bushland which is in good

condition. It seems doubtful that this access would be required after the work was finished.

The Trust is also concerned that most of the vegetation in the vicinity of the Devlin's Creek viaduct will be killed due to lack of light and water should the gap between the carriageways in this area be closed. In particular there is a colony of Scrub Turpentine (*Rhondamnia rubescens*), a small rainforest species, growing in front of the rock overhang under the viaduct. These trees are uncommon in the Sydney area, and have proved difficult to propagate. It is the Trust's position that this colony should be maintained, either in situ or by being relocated in an appropriate location further downstream.

The Trust also notes that the rock overhang itself has been identified as having aboriginal significance, so that action needs to be taken to ensure that it is not adversely affected by work in the area.

3. Effect of the proposal on volunteer work in the area.

Over the last thirteen years of the M2's operation volunteers have put in considerable time and effort maintaining and restoring pockets of bushland in and near the M2 corridor. The Trust has been informed of one volunteer working on an area off Midson Road opposite Cheltenham Oval who in 2006 successfully applied for a grant of \$16,000 to help regenerate an area next to the noise wall of the M2. She did this with the express permission of the RTA. The work has been completed, but now it seems that the area is required for the project and her work will be wasted. She is also concerned that access may be needed through her bushcare site from Midson Road which would mean that the hundreds of hours of work put in by the community replanting and regenerating the native vegetation in this area will be lost. Many hours of work have also been done in the viaduct area of the M2 to regenerate between the carriageways at the western end and along the southern side where there was disturbance

when the M2 was built. This work, it seems, will all be for nothing, as the project will destroy it all.

Hornsby Shire Council has also spent considerable funds on bushland management near the M2 corridor in the last twelve years and on catchment remediation for tributaries of Devlins Creek. Much of this seems also at risk.

4. The proposal is not a real solution to the problem it purports to address.

The proposal purports to improve traffic flow along the M2 by providing additional lane space. Whilst traffic flow may be improved in the short term, numerous studies both here and overseas have shown that increasing a road's capacity simply means that more traffic will use it, so that the problems that the increase was intended to address simply return, with greater numbers of vehicles involved. Whilst an increase in vehicle numbers may increase the revenue generated by the M2, it does nothing at all to address the fundamental problem of Sydney's over-reliance on the private vehicle as a means of transport. The Trust understands that the project will be completed without cost to the NSW Government, but in the Trust's submission that is beside the point. In particular, accelerated implementation of projects such as the North-West Rail Link would deal more effectively with traffic congestion, on both the M2 and other traffic arteries, by increasing the number of persons using public transport and so reducing the need for private vehicles to use the road system. The Trust submits that this gives a much better outcome, in both environmental and economic terms, than any increase in Sydney's motorway capacity.

Michael Stove

President

21 June 2010

