

Department of Planning, Industry and Environment

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SSI-8862

8th March 2021

BEACHES LINK AND GORE HILL FREEWAY CONNECTION ENVIRONMENTAL IMPACT STATEMENT (EIS)

1. INTRODUCTION

This submission is made by the Manly West P&C Association, which represents the parents of 880 children who are being educated at the Manly West Public School in 2021.

The submission considers the serious impacts of the project on the school, both during six plus years of construction and when the new road is operational, with a focus on traffic management and air quality issues. Mitigation measures that will help reduce the impacts are requested.

The EIS public exhibition period of 9 December 2020-1 March 2021 largely coincided with the end of the school year in 2020, the summer school holidays, the COVID lockdown of the Northern Beaches and the beginning of the school year in 2021. The Manly West P&C has not met during this time as the first General Meeting of 2021 is scheduled for late March 2021. The public exhibition period has not allowed parent volunteers time to scrutinise the EIS documents in detail.

Members of the school community have additional grave concerns about the severe environmental damage highlighted in the EIS and the unproven validity of a new tolled motorway as a suitable infrastructure investment to support sustainable future growth in the Northern Beaches. Parents have submitted many individual submissions covering these topics.

2. IMPACTS OF THE PROPOSAL ON MANLY WEST PUBLIC SCHOOL

2.1 *Traffic and road safety impacts*

At Manly West Public School, we are already experiencing major traffic issues in the streets around the school and we have been working closely with the Northern Beaches Council over recent years to alleviate these issues and make the road conditions safe for all students, parents and the local community.

The proposed works will see traffic congestion worsen on Sydney Road, Burnt Bridge Creek Deviation and adjoining streets during the construction phase and when the tunnel is operational.

The EIS states that 1,195 light truck movements, and 495 heavy truck movements **per day** will occur at the corner of Sydney Road, Maretimo Street. This equates to 2.5 truck movements per minute, assuming movements occur during standard construction hours.

New traffic lights will be installed on Sydney Road at Maretimo Street and on Burnt Bridge Creek Deviation. The frequent truck movements will cause queues to build up.

Congestion on and around Rosebery St and Condamine St is already horrific and the EIS doesn't hide from the fact that it will get worse. Suggestions to ease this include:

- Join the two ends of Quirk Rd.
- Replace the roundabout at Balgowlah Rd/Roseberry St with traffic lights.
- Replace the roundabout at Kenneth Rd/Roseberry St with traffic lights.

This will induce extra traffic around Manly West, further reducing the safety of children walking and cycling to school.

In addition, 'rat running' will occur as traffic tries to avoid the area around the Balgowlah Golf Course construction site. This will also occur once the Beaches Link is operational as drivers try to avoid the tolls and the additional traffic lights in the Seaforth area.

The EIS highlights Woodland St and Condamine St as roads that will see an increase in traffic but we are very concerned that the effects of rat running will impact on the streets around Manly West, in particular Hill St and Boyle St.

Many student walk or cycle to school on the Burnt Bridge Creek shared path, which is likely to be partially closed during construction. We are concerned that children currently using an active mode to reach school will need to be driven to ensure their safety.

Of course, Increased traffic not only affects pedestrian safety but also creates issues with noise, traffic management, air pollution and health.

2.2 Air quality impacts

Despite measures to suppress dust during construction, we are concerned that dust will be experienced on the school grounds especially on windy days. Dust will affect children during recess and lunch breaks, outdoor school assemblies and PE classes. Indeed, Chapter 12-22 of the EIS states *that even with rigorous air quality management in place and effective best practice management measures, there is the risk that land uses near construction works might experience dust impacts*. These impacts are heightened for students and community members with existing respiratory issues and allergies.

Increased traffic in local streets will also exacerbate the problem of the air pollution from the exhausts of vehicles.

More significantly, the unfiltered tunnel ventilation outlet will be located some 1200 metres from Manly West Public school. The Chief Scientist's modelling says the most concentrated ground level emissions from the outlet will be 1200m away. Manly West will therefore be subjected to poor air quality in some weather conditions, causing breathing difficulties and increased asthma among children and staff.

3. MITIGATIVE MEASURES

The Manly West P&C Association has grave concerns about the expected and unknown impacts of the Beaches Link and Gore Hill Freeway Connection proposal in the vicinity of Manly West Public School due to the reasons outlined above.

Should Transport for NSW and DPIE continue with the project, we request that the NSW Government adopts the following mitigative measures to ensure the health, amenity and safety of the Manly West school students, teachers, staff and the school community.

3.1 Consultation

- TfNSW must establish a Working Group with Manly West Public School and its P&C to provide a forum to identify and appropriately manage construction and operational issues for the Beaches Link Tunnel. These include (but are not limited to):
 - Noisy construction works
 - Dust emissions
 - Access arrangements
 - Long-term operational issues
 - Implementation procedures and timeframes for new transport infrastructure (e.g. road widening, bus bays, parking, intersections, pedestrian lights, pedestrian pathways etc)
 - Ongoing community engagement and involvement.
 - The mitigation measures requested must be included in the Scope of Works for the contractor and be regularly reviewed/monitored by the Working Group.
 - The Conditions of Approval for the project must include a requirement that the community communication strategy identifies Manly West Public School

and its P&C as key stakeholders on the list of people and organisations to be consulted during the design and work phases.

- We are concerned that the design shown in the EIS is not necessarily the final design and that changes can be made by contractors. Therefore, we ask that a process be put in place where we are notified of any changes affecting the school and given the ability to request amendments where appropriate before the design is finalised.

3.2 Traffic

- The Manly West Working Group must be actively involved in the development of the Construction Traffic Management Plan and any subsequent revisions.
- An independent traffic study is to be prepared with TfNSW funding to look at particular issues affecting traffic and access around the school before construction starts.
- Careful planning to be undertaken to ensure that modifications to the road network near the school prioritise **improved** access by foot, bike and scooter. It is essential that traffic congestion, pedestrian access and safety do not deteriorate as a result of the construction and operation of the Beaches Link tunnel. Traffic calming should be considered to improve walkability.
- Fencing and other barriers around the construction site must not interfere with pedestrian access to ensure that pedestrians and cyclists can navigate a safe route to and from school. This is particularly relevant for students travelling from the western part of the catchment along the Burnt Bridge Creek shared path.
- Measures to be implemented to eliminate rat-running via Hill Street, Boyle Street and nearby sides streets as vehicles try to avoid congestion at the Sydney Road/Burnt Bridge Creek Deviation junction.

3.3 Air quality

- Inclusion of the school as a 'Community Receiver' site to reflect its sensitive location 1200 metres from an unfiltered ventilation stack.
- Air quality to be monitored before, during and after construction by independent consultants. Construction operations to be modified as required (in consultation with the school) to ensure pollution levels are kept within acceptable limits as defined by independent consultants.
- TfNSW to publish regular and comprehensive information and notifications in the event that air pollution levels are raised to unsafe levels.
- Penalties to be imposed on the contractor(s) when acceptable dust levels are exceeded.
- The EIS states that the unfiltered tunnel air will be ejected from an elevated ventilation outlet high into the atmosphere through buoyancy and speed, and will be diluted as it mixes with the surrounding air and becomes indistinguishable from background levels. Although the tunnel operators will be required to meet air quality limits and the air quality will be monitored, we call on Transport for NSW

(TfNSW) to filter or capture and store the tunnel air before it is ejected from the ventilation outlet.

- If operational air quality does not meet safe standards, following robust assessment by independent consultants, filtration devices must be retrofitted to the ventilation stack.

In summary, the primary purpose of this submission by the Manly West P&C Association is to ensure the short and long term health (both physical and mental), amenity and continued high level of education for current and future students is not compromised owing to the construction and operation of the proposed Beaches Tunnel Link.

Please contact me if you require any further information.

Yours sincerely,



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Supporting our school, our students, and our school community

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