

Submission objecting to the Northern Beaches Tunnel

I strenuously object to the Northern Beaches Tunnel (NBT) for the following reasons:

1. More consultation – less marketing:

There has been a gross lack of genuine consultation with residents by Transport for NSW (TfNSW). In all of my engagements with TfNSW to date I have observed that TfNSW is simply on a marketing campaign to sell the NBT, and is not genuinely interested in hearing the concerns of local residents.

The issuance of the Environmental Impact Statement (EIS) shortly before Christmas 2020 with a closing date for submissions at the end of February 2021, and the total disregard of widespread community calls for an extension to the submission timetable, leads me to the conclusion that TfNSW does not want to have its 11,000 page EIS report subjected to effective public scrutiny and wants to rush this project through with a minimum of community appraisal.

Also, three local schools in Balgowlah/Seaforth were shocked when the latest version of the NBT plan showed that, despite concerns raised with TfNSW, the tunnel opening had moved even closer to their schools. What is even more insulting is that the EIS states that this design change was made following 'community feedback'.

Admittedly, the TfNSW representatives at community forums have not attempted to perpetuate this 'community feedback' façade and admit that the real reasons for moving the Balgowlah tunnel opening to the South was to avoid the cost of:

- replacing the existing Kitchener Street Bridge;
- relocation of underground services beneath the Northern section of the Burnt Creek Bridge Deviation, and
- tunnelling between the old opening and the new (i.e. it's a slightly shorter tunnel).

I am left with the overwhelming impression that this was a done deal well before the EIS was ever issued, and this process is now nothing more than TfNSW ticking off formalities.

At a minimum the EIS consultation period must be extended.

2. Poor disclosure by TfNSW:

As late as August 2020, in its Beaches Link Community Update, TfNSW was still using an illustration of its November 2019 design for the Balgowlah site post project completion. This illustration showed the tunnel opening further to the North along Burnt Bridge Creek Deviation and the longer access road onto Sydney Road.

Why was this image still being used by TfNSW in August 2020?

It is clear that by this date TfNSW had already decided to move the Balgowlah tunnel opening Southwards, as this is the design reflected in the EIS published in December 2020.

The belated disclosure of the change to the Balgowlah tunnel opening, when combined with the hurried EIS consultation process, smacks of a deliberate attempt by TfNSW to minimise the opportunity for community deliberation and response.

The EIS itself is also poor at disclosing key information to local residents. In particular, while the EIS does note that *“Night time deliveries would be required to support the tunnelling activities,”* it fails to disclose the pertinent information that these deliveries will in fact be, at the Balgowlah site at least, heavily laden cement trucks entering the site all through the night, and undoubtedly exiting again after depositing their load. This is the sort of information that should be clearly set out in the EIS as it can materially impact the way in which the surrounding community might view this project.

3. Alternative options are given inadequate consideration:

The EIS fails to provide sufficient detail to substantiate its dismissal of alternatives to the NBT.

The EIS dismisses travel demand management measures (e.g. congestion charges) because it would require *“considerable changes in social attitudes, travel behaviour and government policy and can take many years to achieve”*. However, it provides no evidence in support of this statement. What testing was done to assess social attitudes in order to determine the level of change required? The successful implementation of the congestion tax in London shows that these systems can be successfully implemented. Also, to dismiss this option on the grounds that these measures can take many years to achieve is amusing given that the NBT itself is not projected to be completed until 2027.

Furthermore, the options for possible improvements to the existing arterial road network are glossed over.

Surface solutions along existing arterial routes are discarded on the basis that these *“would result in unreasonable amounts of land acquisition and environmental and social impact”*. Again, what evidence does TfNSW have in support of this statement, and how was it measured against the considerable land acquisitions and social and environmental impacts that will occur as a consequence of the NBT?

Similarly, it was stated that initiatives to provide additional capacity along the Military Road/ Spit Road corridor without major widening schemes (e.g. peak period parking restrictions, bus lanes, T3 lanes and reducing Spit Bridge openings) would *“only provide minor and short-term benefits”*. Based on what evidence?

With the exception of road-widening, all of the above options could be implemented by TfNSW at negligible cost compared to the NBT.

Why doesn't TfNSW implement these options as a priority? If in 5 years' time they are not producing the necessary improvements or coping with traffic demand, maybe then it could justify the multi-billion dollar infrastructure project that is the NBT.

4. Public transport is ignored:

The current NBT plan fails to appropriately prioritise public transport.

It is clear that TfNSW is focused on building projects for private car journeys instead of public transport. This is demonstrated through the failure to provide for a designated bus lane in the NBT and an unwillingness within TfNSW to test the effectiveness of the demand management measures or other initiatives referred to in point 2 above (many of which would have the added bonus of encouraging greater usage of public transport).

The B-line service is a great success and its routes should be expanded to include a service from Manly and another service through Seaforth. Instead, the EIS simply discounts the effectiveness of such express services in the future on the basis of the forecast capacity restraints of the existing arterial road network.

What is worse is that TfNSW appears intent on making its forecast capacity issues a reality by cancelling many of the existing bus services that Northern Beaches residents had relied upon, thereby forcing them back into private vehicles.

5. Habitat destruction:

The EIS has identified a number of the serious negative environmental impacts upon the flora and fauna in and around Balgowlah and Wakehurst Parkway.

The projected reduction of water flow in the Burnt Bridge Creek will effectively mean the extinction of the ecosystem that currently exists in and around it.

Further, the widening of the Wakehurst Parkway with the consequential loss of bushland (including almost 2,000 established trees) and the installation of new lighting, will all have a permanent detrimental impact upon the local wildlife and surrounding bushland.

While these issues have been noted to some degree in the EIS, it fails to propose any effective solutions.

6. Inadequate testing / modelling:

The EIS is also flawed in a number of material respects, including:

- a) The traffic modelling represented in the EIS is unrealistic. The project related induced demand (new trips) is estimated to be 0.3% of additional daily trips in the Sydney metro area in 2037. Now this may be true for weekday traffic (provided we ignore the higher density living that will be imposed on the Northern Beaches in order to justify the project), however it cannot possibly have factored in the considerable additional traffic volume as a consequence of the Northern Beaches becoming the most accessible beaches for most Western Sydney residents. Given that the existing local road network is already proving to be grossly inadequate, the influx of additional traffic into the area post-NBT will be a disaster.
- b) The failure to station a community receiver/receptor in or about Balgowlah Boys High School (with over 900 students) which is located:
- ~ 300m from the Balgowlah emission stack;
 - around the same height as the top of the stack, and
 - in line of the prevailing winds from that stack,
- is a gross dereliction of the TfNSW's duty to ensure that it undertakes all reasonable measures to investigate the potential health impacts of this proposed project upon children in the local area.

7. Pollution is disregarded:

The failure to plan for filtration of the emission stacks is simply penny pinching. TfNSW has assessed the pollution risk to the surrounding community as 'minimal'. Had I moved into the area when the stacks were already in place then it is clear I would have accepted that risk. However, that is not the case. I do not want to be exposed to any additional pollution coming from the emission stacks, no matter how low TfNSW might consider those associated health risks might be. As with cigarette smoke, there is no safe level of exposure to these pollutants.

8. Risks to public safety:

Increasing the volume of heavy vehicle (HV) traffic on what is already a congested road network, and very close to a number of schools, poses an unacceptable risk to the public.

The EIS acknowledges that along Burnt Bridge Creek Deviation, Sydney Road and Spit Road, HV traffic only accounts for between 13% to 7% of total traffic in AM peak and between 7% to 4% in PM peak, yet in the period 2014 to 2019, HVs were involved in a disproportionate number of the accidents in these areas including:

- 45% of accidents on Burnt Bridge Creek Deviation;
- 22% of accidents on Sydney Road, and
- 26% of accidents on Spit Road.

The EIS also identifies the high crash rate on Sydney Road as a key road safety issue. However, with the exception of the new lights at the intersection with Maretimo Street, no risk mitigation measures appear to have been proposed.

The EIS attempts to claim that the NBT will lead to a reduction of vehicle accidents once it is completed, However, it fails to note the high probability that during the construction of the NBT there is likely to be many more traffic accidents involving HVs due to the increased volume of HVs on the road. Given that the primary HV entrance to the NBT construction site is located directly opposite one of the largest boys' schools on the Northern Beaches (900+ students), we can only hope there will be no fatalities.

9. Ongoing trust issues:

In light of the way this entire process has been conducted I now no longer trust that TfNSW or the State Government will honour commitments made in the EIS.

I am particularly concerned that the promise to convert 90% of the Balgowlah construction site into green space will not be delivered.

However, even if it is delivered initially, there is currently no guarantee that the eventual owners of the land (whether this be Council or State Government) will not subsequently renege on the promise and use some or all of the land for residential development.

The recent attempt by the State Government to sell part of the historic Dalwood Estate in Seaforth for residential development demonstrates that this risk is not fanciful. Fortunately, because the land in that instance was held in trust and was not under State Government ownership, this action was thwarted.

To avoid these types of land grabs in the future, we need an iron-clad arrangement with the State Government to permanently prevent the Balgowlah green space from being re-purposed or sold.

History has shown that the best way of achieving this might be if the land was put into a trust outside of Government control (both State and Local).