

Lee and Peter Purches
35 Woodbine Street
North Balgowlah NSW 2093

Submission regarding the Environmental Impact of the Beaches Link and Gore Hill Freeway Connection

**Joint submission by Lee Purches and Peter Purches
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Notes

- This submission addresses our concerns in regard to the Beaches Link Tunnel section of the broader Beaches Link and Gore Hill Freeway Connection.
- We have made no reportable political donations in the previous two years.
- We have used the following use of terminology:
 EIS - Environmental Impact Statement
 The project – refers to the Beaches Link Tunnel section of the Beaches Link and Gore Hill Freeway Connection

Objection to the Beaches Link Tunnel project

We object to the construction of the Beaches Link Tunnel due to the following key factors:

1. Impact on the local community during construction
2. Long term impact on the health and well-being of the local community
3. Long term traffic implications and the lack of planning to address road infrastructure around already heavily congested streets in the local area and around the construction site
4. Destruction and risk to native bushland and water course areas
5. Impact on Middle Harbour and marine life
6. Socio-economic factors and longer-term benefits
7. The lack of adequate exploration of alternative transport solutions

Our objections are based on having taken an interest in the proposed project in its early stages, attending local information sessions, researching the EIS information provided by NSW Transport, listening to local concerns, and based on our knowledge as both a social worker and medical practitioner who have lived in the local area for many years, including growing up and going to school in the local area.

1. Impact during construction

1.2 Vibrations and pollution. Concern regarding vibrations, excessive light emissions, reduced air quality, dust, and noise pollution associated with 24-hour drilling, removal of spoils and other movement of traffic during the construction. It is unacceptable for residents of the Southern section of the Northern Beaches to have to endure these impacts for many years and this will severely compromise their health and well-being.

The EIS provides little reassurance as to these concerns being addressed. Some examples are provided below:

Executive Summary of the EIS states “where airborne noise management levels are exceeded, there would be a requirement to implement reasonable and feasible noise mitigation” (page E-22, EIS). Who will determine what is “reasonable and feasible”? This situation is untenable and would likely see local residents who have concerns being at the mercy of the discretion of contractors who may or may not care about the impact on local residents.

The Executive Summary also refers to “noise management levels” and the fact that ‘the use of rock-hammers for tunnelling activities has the potential to exceed noise management at various locations, however such activities would be scheduled outside evening and night time periods (where feasible and reasonable) to avoid or reduce ground-borne noise level exceedances on receivers”. Who determines what is feasible and reasonable? Surely, acknowledgement of potential noise pollution is a good enough reason for the NSW Government to withdraw from this project and consider alternative transport solutions.

1.3 Potential damage to properties. What is the likelihood of houses acquiring some damage due to cracking resulting from vibrations. It appears that there is acknowledgement that there will inevitably be some cracking and other damage to properties. The Executive Summary of the EIS indicates that owners of properties damaged will be compensated. However, repairs to damage (if it is repairable) would be carried out, only if the property has been inspected prior to the project beginning. This, of course, would likely be once the project is completed, many years later, and this could impact on an owner’s ability to sell their property in the meantime

How well informed are property owners of this situation? How is this information being rolled out to ensure all residents in the suburbs affected are able to make an informed decision about having a pre-project inspection conducted on their property? For example: are the owners of the houses built on cliff edges around the Seaforth Bluff area where drilling will occur aware of the potential for vibrations and possible damage? We would suggest that there are many residents in suburbs potentially affected being fully aware of the implications of this project.

1.4 Traffic and transport impacts during construction. The Executive Summary of the EIS states that there will be “increased heavy vehicle movements around worksites, and localised increases in traffic volumes and traffic delays” (page E-21). There is concern about the quoted estimated “2.5% increase in traffic at peak construction” as being “a small increase to current traffic volumes” (Transport NSW Beaches Link and Gore Hill Freeway Connection EIS Dec 2020 NSW Govt. Information Brochure). This shows very little insight into the already congested, narrow roads in the local area, and existing heavy volume of traffic and delays, especially at peak times. There is a very high likelihood that both construction and operational vehicles will look for short cut routes to save time (time being important to contractors). In particular, the roads around Balgowlah are already very congested and the roads between Balgowlah and North Seaforth are narrow and not equipped to cater for an increase in traffic, especially heavy construction vehicles.

Importantly, how will trucks be stopped from using local smaller streets as short cuts and how will this be monitored?

1.5 Increased safety issues. Concern that the safety of children and elderly residents will be highly compromised due to the increased volume of traffic on roads around the North Balgowlah shopping village; North Balgowlah Primary School and the Farmhouse Montessori Pre-school; Balgowlah Boys Campus of the Northern Beaches Secondary College; in the locality along Kitchener Road, Balgowlah Road and Roseberry Street and in Hill Street near Manly West Public School; and in the area around the Seaforth roundabout from Kempbridge Avenue and Sydney Road where there is an aged-care facility and leading down Frenches Forest Road to Seaforth Primary School.

1.6 Impact on parking. There is also the issue of adequate parking for workers in and around the construction sites which will have a major impact on local residents.

1.7 Temporary partial closure of Middle Harbour (from Northbridge and Seaforth adjacent to Spit West Reserve to enable the construction works for the immersed tube tunnel). We do not believe that the public has been fully informed about this part of the project and the temporary and long-term impacts over many years.

1.8 Disturbance of toxic organic and non-organic sediments which will impact on the quality of the harbour water affecting both a fragile marine life and quality of the water for fishing and swimming. There is particularly concern for use of the Clontarf harbour pool which supports the enjoyment of many families from all over Sydney during the summer months and the highly popular Clontarf dog leash free beach where dogs can play in the shallow waters. With rising temperatures over the next 10 years this is likely to have a major impact for the local community and visitors to the area.

2. Long term impact on the health and well-being of the local community if the project proceeds.

The impact of this project on human health is inevitable. Some examples include:

2.1 Concern about air quality. Having the polluted air in the tunnels being fanned toward the two entrances of the tunnels and into unfiltered stacks shows total disregard for the health and wellbeing of the local community. We cannot see how the current low levels of pollution in the Sydney area justifies it being okay to allow for unfiltered polluted air to be released across the area. Being located between both stacks will result in the suburbs of Balgowlah, North Balgowlah, North Seaforth, Manly Vale and Seaforth being greatly affected, regardless of which way the wind is blowing. In this area there are many primary schools, pre-schools and day care centres, two high school campuses, and several aged care facilities with vulnerable residents. As in most areas, there are residents with chronic illnesses who require the best possible air quality. We live in a first world country where we pride ourselves on our quality of life and meeting basic human rights. We are in a position to choose alternative transport solutions. However, if this costly project is so important to the NSW Government, then the cost of filters to ensure the health and wellbeing of local residents would seem to be justified.

2.2 Impact on Mental Health. Concerns about the stress on residents over an extensive period of time due to noise, dust, pollution, excessive lighting, increased traffic, traffic delays, and worry about potential damage to properties. Local residents will have a lot to endure over many years and this is likely to impact on the mental health of individuals and the community as a whole. What strategies will be in place to support the mental health of local residents?

3. Long term traffic implications

3.1 Concern about the potential traffic rat runs during and after completion of the tunnel and many drivers will try to avoid using the tunnel due to the cost of the tolls.

Of particular concern is the suburban road system along Woodbine Street at North Balgowlah and other local streets leading up to Wakehurst Parkway in the west and east to Kitchener Street and Balgowlah Road at Balgowlah. This is a busy road system, especially around the North Balgowlah Shops and North Balgowlah Public School and Montessori Farmhouse Pre-School. In the past this road system had a permanent speed limit of 40km/h but at some stage this was change to 50km/h. We would strongly suggest that additional speed bumps, roundabouts, traffic lights and

pedestrian crossings will be required and the speed limit should be readjusted to 40 km/h. Interestingly, Manly now has a speed limit of 30km/h in high pedestrian areas.

Other local traffic areas likely to be affected are mentioned under 1.5 (Increased safety issues)

3.2 Lack of planning to address increased traffic congestion

There appears to be no planning for local road infrastructure improvements. What is going to be done about the already congested traffic in the local areas around the project development? Some examples include:

- Balgowlah: Balgowlah Road, Roseberry Street, Kenneth Road and Condamine Street.
- Manly Vale is extremely congested at peak hour and it is anticipated this will be impacted both during construction and in the longer-term with traffic congestion building up both in and out of the tunnel.
- Seaforth: It is also expected that there will be increased traffic around Ethel Street and other streets and the roundabout at Seaforth leading down Frenches Forest Road and Brook Street near Seaforth Public School. There is again already heavy traffic congestion in this area at peak hour in the mornings and afternoons.

4. Destruction of native bushland and water course areas for the Manly Dam Reserve and Burnt Bridge Creek area

4.1 Manly Dam

4.11 Manly Dam is one of the few unique inland water catchment areas that supports Australian flora and fauna as well as providing an important recreation area for both local residents and visitors from other states and overseas. During the pandemic the Manly Dam Reserve has provided an important space for people to exercise and relax during lockdowns and it is an important site for scientific water research and education field trips for students.

4.12 We have major concerns regarding the destruction of native bushland along the Wakehurst Parkway ridge during drilling and construction. This area is part of the catchment for both the Manly Dam and Bantry Bay, and an important wildlife corridor and urban sanctuary for native flora and fauna and is a significant cultural heritage area.

4.13 There will be ongoing the risk to both the wildlife and the unique flora of the Manly Dam Reserve due to changes in their environment, especially from the polluted air associated with the unfiltered stacks and toxic sediments in the water catchment.

4.14 This is a unique area of Sydney with Aboriginal and non-Aboriginal historical and cultural significance, regardless of whether they are covered in vegetation or not. Once destroyed this heritage cannot be restored. This area should be prioritised for protection as we look for alternative transport solutions.

4.15 Pollution of the run off over the catchment area for Manly Dam will impact on wildlife, the unique flora and human activities such as swimming and kayaking. This is a unique and fragile environment within a busy city and the biodiversity requires our protection.

4.2 Burnt Bridge Creek area

4.21 The Burnt Bridge Creek is an important water course for the Manly Lagoon. There is concern about pollution to the creek during construction and longer term from the polluted air quality from the unfiltered stacks.

4.22 The natural flow of this creek will also need to be adjusted to accommodate the drilling of the tunnel which will impact on local flora and fauna. The EIS trends to down play the significance of this adjustment e.g. “localised adjustment of a small section of Burnt Bridge Creek for road widening and drainage work” (Beaches Link and Gore Hill Freeway Connection EIS Information Brochure; Transport NSW Dec 2020)

4.23 There are many species of wildlife in and around the creek including frogs, insects, birds and the bat colony which is located close to the drilling site along the Burnt Bridge Creek deviation.

5. Impact on Middle Harbour and marine life.

5.1 We are concerned about the environmental impact on Middle Harbour and the marine life resulting from the tunnel construction. Our understanding is that an “Immersed tube tunnel” is to be installed which will disturb toxic organic and inorganic chemicals which could lead to the death of marine life in the area including white seahorses. We are also concerned about the long-term consequences on Middle Harbour of having the immersed tube tunnel.

5.2 As mentioned in section 1.5, there is concern that disturbance of toxic sediments may have some lasting impacts on Middle Harbour including on the quality of the water and safety for swimming and fishing especially at Clontarf.

5.3 The EIS identified the issue that a colony of Little Penguins may be disturbed during construction of the tunnel. This is of grave concern given the already fragile nature of penguin colonies in the Sydney Basin area.

6. Socio-economic factors and longer-term benefits

6.1 Projected cost / benefits would suggest minimal long-term benefits to traffic congestion compared to the very expensive outlay of construction of the Beaches Link Tunnel and the major inconvenience for a large community over a long period of time.

6.2 The EIS focusses on the positive socio-economic benefits however there is glossing over the true cost / benefit analysis. For example: The EIS information brochure states that this project will “involve tunnelling 24 hours a day, seven days a week” and “the majority of tunnelling on the surface will take place inside acoustic sheds which is supposed to manage the potential impacts of noise, dust and light spill. These sheds will be closed at night to further reduce noise’. It is also planned that there will be “light vehicle movements outside of standard construction hours”. (Beaches Link and Gore Hill Freeway Connection EIS Information Brochure; Transport NSW Dec 2020)

6.3 What guarantee does the community have in regard to monitoring what are acceptable levels of noise, vibrations, dust, inconvenience during construction? Who will monitor this? Who will intervene? Who will represent the community’s interest? What complaint mechanisms will be in place for property owners? How will the public be able to address longer term consequences?

6.4 The Beaches Link Tunnel will concentrate congestion even further at either end of the tunnel entrances. Long term it is estimated that the reduction of traffic along Military Road will be 10%. This is a small reduction for such a costly project that has major short-term and long-term consequences for the local areas affected by the project with major consequences for the environment.

It is concerning that the EIS does not adequately compare the potential benefits of alternative sustainable, environmentally friendly approaches to transport solutions. Expensive tunnelling that is being considered for this project is an outdated transport solution and will leave Sydney no better off in the long term. Transport solutions must contribute to reducing emissions from cars and support strategies to help address climate change.

6.5 Alternative transport solutions would be able to support many of the proposed socio-economic benefits mentioned in the EIS.

7. The lack of adequate exploration of alternative transport solutions

7.1 There is concern that the NSW Government has not adequately explored alternative transport solutions for the Northern Beaches.

7.2 COVID-19 has shown us that we are capable of adapting and finding low cost solutions to traffic congestions in cities. We now have an opportunity for a new way forward that would be cost effective and contribute to reduction in emissions and other climate change strategies. The pandemic has shown us that getting cars off the road can be achieved, reducing congestion and pollution.

7.3 We know many people are willing to work from home and that some form of working from home is sustainable for many work places. This allows families more time together, and has many health benefits of workers spending less time travelling each day, having more time exercising, and spending time with their families and sharing caring roles.

7.4 Reducing cars on city roads can be achieved by supporting working from home, as well as supporting efficient public transport, supporting suburban development and local businesses, and improving existing local road infrastructure.

7.5 The NSW Government should be putting more resources into supporting suburban development, regional development, decentralisation of NSW departments, safer roads to increase use of bicycles, and continuing to upgrade major regional roads.

7.6 At the same time, we need to embrace new technologies for traffic solutions that support reduction in emissions. One such example is electric driverless buses. Driverless electric buses would be cost effective, and would contribute to reducing harmful emissions that are currently contributing to climate change. This technology does not require major infrastructure which impact on the local environment. This technology can be provided all over the city, with accessible parking to support the reduction in use of cars.

7.7 Inadequate exploration of alternative transport solutions and the use of outdated technology will result in Sydney being way behind countries overseas.

NSW Government is urged to continue exploring alternative options to the current proposed Beaches Link Tunnel.

Thank you for considering this submission. We would be more than happy to be contacted.

Lee and Peter Purches