

Submission Regarding EIS for Beaches Link and Gore Hill Freeway Connection - SSI-8862

To whom it may concern.

I object to both the EIS, and the actual Beaches Link proposal.

I am writing from the perspective of :

1. **Concerned resident of Manly Vale** – who will be impacted by the increased traffic using rat runs, the construction chaos on Burnt Creek Bridge Bypass, the destruction of the Balgowlah Golf Course, the loss of the Burnt Bridge Creek and downstream waterway, the increased traffic on Condamine Street, etc.
2. **Parent of a Balgowlah Boys High School student (BBHS)** – who will suffer the noise, dust and construction impacts for 5-8 years, will be unable to attend school functions easily, will be impacted by rat runs, will be impacted during exam periods, will be impacted by air quality issues, etc.
3. **Office Bearer of Save Manly Dam Catchment Committee (SMDCC)** – who having fought hard to protect the integrity of the catchment will be constantly butting heads with TfNSW and their contractors as the promised water treatment processes fail and the catchment is impacted in some way. Having experienced the Manly Vale Public School development I am not looking forward to this much larger construction footprint.
4. **Community Representative on Manly Warringah War Memorial State Park Advisory Committee. (MWWMSPAC)** – who will be forced to concede to State and Local Government concessions for a development that has significant impacts to the integrity of the Park.
5. **A supporter of Public Transport and the implementation of the B-Line bus network** – who will continue to support the system despite the government's plan to sell this off and reduce services, rather than provide an increased level of infrastructure to support this successful venture. I will be lobbying for increased public transport considerations to address the future traffic issues and travel needs.
6. **An engaged community member** – who has tried to educate the community about the realistic and potential impacts of the Beaches Link Tunnel, who values the area we live in, who is particularly grateful for the foresight of people who acted to reserve and preserve the high-value bush and waterways, who values natural environment not simply because it is a place of recreation and renewal, but because we believe it has intrinsic value independent of short-sighted human demands.

I acknowledge that there is need for solutions to the many transport problems across the Northern Beaches, but I do not see the current Beaches Link proposal as being the solution. Policies and infrastructure that are innovative and paradigm-shifting are needed - not an expensive, unimaginative, 20th century solution to a 21st century problem.

I wish to lodge my objections to and comments on the Beaches Link Tunnel proposal based on the following points in no particular order:

1. Lack of consultation and due process to provide suitable information to impacted areas.

I have participated in 2 online Q&A sessions for Balgowlah and Frenchs Forest. I have been online and read significant amounts of the 12,000 pages of EIS – including appendices. I have participated in a session from TfNSW for the MWWMSPAC.

I consider myself to be reasonably well read in what is being proposed as I have made a substantial effort to become so. I am astounded at the lack of general and real knowledge about the project in the local community.

I do not believe there has been a fair and reasonable process for communication with Northern Beaches Residents. There is a huge assumption that everyone has access to the internet and is competent in reading 12,000 pages of detailed information. No face to face scenarios have been provided and once again, the webinars assume technical competence and access. You have isolated and ignored large sections of the community.

In addition to TfNSW actions, our own local free paper, The Manly Daily, has been moved online where people need to subscribe to the Daily Telegraph to be able to read it. Once again, the residents who religiously read their local paper 3 x times per week are now forced online or do not see it at all.

Many groups, individuals and organisations have approached their local member James Griffin, TfNSW, the Transport Minister, and the Planning Minister to show some compassion and grant extra time – however this has landed on deaf ears. Once again, the token community consultation process is maintained. NSW Government seems to be hastily pushing this development through.

The information that has been provided is either, too high level and full of glossy motherhood statements and promises, or so detailed that you need to have a few University Degrees to be able to read through the detail to get the true picture. Despite this, many groups have found many failures within the EIS.

The current EIS is inadequate in light of the above and other shortcomings raised in this submission, and a revised EIS containing the additional information should be exhibited and a three-month period (not including the Christmas/ January period) allowed for public comment.

2. No Business Case has been released.

Census journey to work data shows that 52.1% of Northern Beaches residents work in their own LGA. NBC data shows there are 265,468 people in NB LGA in 2016, projected to grow to 288,431 in 2036 representing an increase of approximately 22,963 people (8.7% growth or 0.4% annual growth). This level of growth, and lack of travel outside the area, does not appear to deserve \$14billion of the taxpayer's money being spent by the NSW Government.

The project only generates 1500 temporary jobs in construction. Offset against this are job losses in the Northern Beaches for businesses affected by road closures, loss of parking etc during construction.

The Beaches Link is designed to allow massive construction at Frenchs Forest and probably Brookvale-Dee Why. Frenchs Forest will be the only major development in Sydney without a railway. Its feasibility for anything other than a commuter village is doubtful.

The EIS for the Beaches Link Tunnel covers issues relating to a particular project – and has nothing to do with the economic benefits of the project, whether these economic benefits can be achieved and if these benefits can be balanced against the potential negative impacts on the environment and delicate ecosystems.

Could you please release the Business Case?

3. No consideration of COVID-19 & Working From Home (WFH) adjustments / pivots

The EIS does not take into account the significant changes as a result of COVID-19 in 2020. The business world, education sector and community were able to “pivot” and make personal changes to adjust to the new scenario. These changes will have lasting effects on travelling to the CBD for work.

Comments such as those in Infrastructure Australia’s December 2020 report:

“Infrastructure beyond Covid-19” - A 2020 Gartner CFO survey reports that 74% (CFOs) expect a shift whereby some employees remote work permanently, indicating significant uncertainty for CBDs following COVID-19¹.

Where in the EIS is this considered?

Please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

4. No consideration of the B-Line implementation

Data in the EIS shows no consideration of the excellent take-up of the B-Line bus service. People are keen to use the public transport systems provided. Changes in 2020 due to Covid were unexpected, however the community, schools and business sectors all “pivoted” and changed behaviours to manage the different scenario.

Can buses actually use the Wakehurst or Balgowlah entry to the tunnel or is it too steep?

What consideration of social change has been considered?

Please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

5. Little consideration of traffic in the Northern Beaches LGA.

No detailed analysis in the EIS of the likely impact on traffic to and from the Northern Beaches LGA. Instead, there is reference to journey patterns in Greater Sydney: *While these projects would contribute to reducing congestion on the existing road network, they would not be sufficient to resolve the existing road network capacity constraints between the lower North Shore and the Northern Beaches. This is due to the complexity of journey patterns and trip purposes within Greater Sydney and the dispersed nature of origin and destination points for an individual journey.*

Where are the detailed modelling and changes to the suburban streets to cope with the changed demands? We all have friends in Frenchs Forest who have just lived through years of disruption. What guarantees are there that this won’t happen in Manly Vale, Balgowlah and Seaforth?

In addition, the tunnel portal empties at Manly Vale. Most afternoons and weekends, Condamine Street is already full. Where will all this new traffic go? More Public transport options should be available rather than creating and encouraging more traffic.

The Balgowlah exit is poorly designed. Cars turn 180 degrees then go through two traffic lights to get onto Sydney Rd, then another set of lights to go past Burnt Bridge Creek Drive. It’s setting up for traffic jams.

¹ Infrastructure beyond COVID-19, A national study on the impacts of the pandemic on Australia, 14 Dec 2020, p.49

Please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

6. Environmental Agreements broken for NB Hospital Road works:

Agreements were established with TfNSW regarding the management of road-kill, injured animals and fencing. Community liaison people were involved in assisting with this process. Each of these Environmental Agreements was unmet and fines were received for environmental damage and run off.

- Road-kill recording – instead of being handled by TfNSW or their delegates – it has fallen to volunteers.
- Injured animals – Volunteers have continued to be sent out for injured animals instead of agreed processes.
- Fauna Fencing was agreed to on Wakehurst Parkway North where Trefoil creek comes in. It has taken over 2 years to implement the fauna fencing which was supposed to be in place in advance of the construction.

How will this be managed for the BLT project? What guarantees are there?

7. Recommend staggered implementation of Beaches Link Tunnel (BLT) portals, Gore Hill Freeway upgrade (GHF) and Western Harbour Tunnel (WHT) construction

The EIS section on Cumulative Impacts, does not appear to consider what the full impacts of simultaneous construction of Beaches Link Tunnel (BLT) portals, Gore Hill Freeway upgrade (GHF) and Western Harbour Tunnel (WHT) will be on the traffic in Sydney. We all know that when there is a breakdown on the Sydney Harbour Bridge, then we are impacted at the Spit Bridge.

The impact of simultaneous construction at both BLT portals, The Gore Hill Freeway and the WHT over the construction period will have disastrous consequences for the Northern Beaches traffic. In addition, by constructing both BLT portals which currently provide access to the Spit Bridge simultaneously, this will gridlock already congested traffic on both Wakehurst Parkway and Condamine Street.

I request consideration be given to consecutive (not simultaneous) construction of the WHT, GHF and BLT to lessen traffic congestion and accessibility impacts. This would also provide the ability to re-use existing resources and learn from other projects. The BLT portals should also be staggered development and not be built at the same time.

8. I support the 5 areas raised by Zali Steggall to Parliament on 24/2/2021²

https://www.zalisteggall.com.au/zali_steggall_mp_speaks_on_the_western_harbour_tunnel_and_beaches_link

"I wish to raise five central issues. First, there is the EIS process itself and the limited time for submissions. Consultation on a project of this size and significance must be done in good faith. It must be thorough and not rushed."

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https://www.zalisteggall.com.au/zali_steggall_mp_speaks_on_the_western_harbour_tunnel_and_beaches_link

*Second, great concerns have been raised about the impact during construction on the environment and the community, particularly in the sensitive ecological areas of Manly dam and the Garigal National Park, and the impact on local waterways, such as Burnt Bridge Creek and Middle Harbour. **These need to be addressed.***

*The third area is the long-term environmental impacts of the project, particularly with regard to the placement of exhaust stacks and their lack of filtration. The New South Wales government's intention to pump unfiltered exhaust pollution into the atmosphere is, I would argue, reminiscent of old policies of pumping sewage into the ocean. **We have demanded clean oceans; we must demand clean air.***

*The fourth area of concern is **ensuring this significant infrastructure project is future proof and prioritises public transport solutions.***

*Finally, the New South Wales Liberal government is committed to net zero emissions by 2050, so, accordingly, there must be a requirement for this project to utilise the lowest emissions technology available during construction and for there to be an offset by carbon sequestration projects. **The New South Wales government must ensure that, throughout the construction process, methods and building materials and waste management are of the highest environmental standards.** The information to date falls short of this. I have written to the minister and am awaiting a reply. We must get this right.”*

9. Carbon neutrality by 2050?

NSW Government's commitment to carbon neutrality by 2050 (30 years away) may see great changes in the way we travel. The tunnel could be obsolete soon after finishing if the rest of the world stops producing cars.

There must be a requirement for this project to utilise the lowest emissions technology available during construction and for there to be an offset by carbon sequestration projects.

The New South Wales government must ensure that, throughout the construction process, methods and building materials and waste management are of the highest environmental standards.

Only proceed with a new tunnel plan if the environmental impact is minimal and the long-term economic viability can be supported using the best quality evidence.

10. Traffic Demand is not properly measured and includes a tolling motivation

In the absence of viable public transport options, such a project is focused on increased car travel and thus any short term reduction in traffic congestion along Military Rd and similarly congested roads will soon be reversed. Thus, this project is ill conceived, short sighted, unethical and nonsensical. Perhaps check out the Utopia segment on induced traffic!

This project actually encourages car travel and further tolling in Sydney. Major cities around the world have all shown the negative effects of car congestion in their CBDs yet this project aims to increase car travel into Sydney's CBD with no matching parking provisions anywhere. This is irresponsible planning and not in Sydney's long term interests.

I disagree with this project as it uses public money to end up making a private Toll road and as such is not for the benefit of the wider community. The tolls will be too expensive for most and this will encourage rat-racing and more traffic on local roads. Thus the road/tunnel will never achieve its aim of reducing traffic.

Unlike public transport and creative government policy (e.g. encouraging WFH) a tunnel cannot be “adjusted” in response to changing circumstances. This tunnel is 3 lanes each way, when even the Sydney harbour tunnel is only 2 lanes each way. What demands are being planned for?

Please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

10. Direct impact on Manly Warringah War Memorial State Park (Manly Dam)

The Wakehurst Parkway ridge is simply too narrow for such a wide road. Wakehurst Parkway cannot be widened to 4-6 lanes without destroying the bush at the top of Manly Dam and Garigal National Park. The edge of the road in many places will be either a steep cliff or artificial slope. It will be higher than the trees and visible throughout Manly Dam Reserve and surrounds, and in a lot of Garigal National Park. Edge effects will occur to reduce the quality of the natural bushland and remove habitat.

The road is too wide to have adequate runoff water treatment. Untreated water from the road will pour through the bush, scouring the land and filling streams below with sediment every time there is heavy rainfall. The proposed drainage processes from the EIS are inadequate. The swales suggested would have failed every month in 2020.

Any decrease in water quality in Manly Creek would have impacts on the population of *Galaxias brevipinnis* (climbing Galaxias) which complete their lifecycle entirely within the freshwater habitat above Manly Dam. This population represents the northernmost extent of the species and its loss would represent a range contraction. This species is susceptible to declines in water quality caused by increased sedimentation, contaminants and nutrients.

Street lighting along Wakehurst Parkway will significantly affect both nocturnal and diurnal animals, causing them to die out from that area. Eastern Pygmy Possums will be affected. Without street lighting, a 4-6 lane road with trucks, bicycles and pedestrians will be a safety hazard. If lights are not installed when the project starts, the accidents that follow will lead to street lighting.

Encouraging articulated trucks and construction vehicles to use Wakehurst Parkway could result in accidents and spills that will have significant environmental impacts on Manly Dam and Garigal National Park. A spill of toxic liquid will pour downhill directly into the bush and be extremely difficult to clean and rectify.

There will be a lot of traffic on Wakehurst Parkway. Heavy construction vehicles going 80km/h will dominate the road for the next 30 years. Traffic noise will be heard all across the bush, particularly at night. Truck movements for the key construction site on Wakehurst Parkway will have about a truck per minute entering or leaving.

Construction will destroy a large area of bushland at the top of Wakehurst Golf Course around the two water tanks. This area was declared by Sydney Water to be rich in endangered plant and animal species and worthy of conservation. The potential runoff and sediment from this site is likely to be very damaging to Manly Dam – with the existing water treatment being planned to be used for runoff. There has already been a need for a propeller to be installed in Manly Dam to maintain the water quality following runoff incidents from the Golf Course. It is at a tipping point.

The Aboriginal carvings along Engravings Trail will be under threat from road runoff, construction debris and possible blasting impacts.

Any widening/re-alignment of Wakehurst Parkway should be to the west of the existing road. This would utilise heavily disturbed areas and reduce negative impacts on the higher quality Manly Warringah War Memorial Park bushland.

Improve the standard of roadway run-off retention and treatment along Wakehurst Parkway.

Recommended run-off management found in submissions by MWWMPAC and NBC need to be the minimum standard (for example, use high efficiency sediment basins – HES). It is unacceptable to claim that the current proposed alignment makes it too hard to adequately control run-off impact. Change the alignment to make room, if necessary.

11. Impact on Burnt Bridge Creek and Balgowlah Golf Course

Burnt Bridge Creek will effectively end as a naturally flowing creek. Water flowing down the creek will be drained (flow reduced 96%) and underground water pumped out to a depth of 11m. This is necessary to stop water dripping into the tunnel. The creek and area around it will be dried out and incapable of supporting tall leafy trees and riparian bushland. This will impact the bat colony significantly.

The quick discharge of water into Manly Creek will increase sediment and send road runoff into the creek without the current filtering process, lowering water quality in Manly Creek and out to Queenscliff beach. Instead of a creek, we will have a cement stormwater drain. It will probably need a fence around it to prevent people falling in.

Investigate and report on the impacts of the Balgowlah portal on the lower reaches of Burnt Bridge Creek, Manly Lagoon and Queenscliff Beach. This should be done for construction and operational phases of the project, particularly in view of the undergrounding of the creek and permanent reduction in stream flows (by 96 %!)

12. Use of blasting to speed up tunnelling?

The EIS and TfNSW forums indicated that blasting would be used to speed up the tunnelling process. However I note that this has been ruled out for sections of WestConnex.

Which parts of the tunnelling process in Balgowlah and Seaforth are similar to WestConnex and should be ruled out now for blasting?

<https://www.smh.com.au/national/nsw/blast-plans-dumped-for-final-stretch-of-westconnex-construction-20210217-p5739a.html>

13. New “Design and Place” State Environmental Planning Policy

The government has recently declared an 'open space' initiative/policy in which it seeks to protect precious open green spaces. This project is not in alignment with this policy as this project will result in bulldozing at Seaforth and Flat Rock Gully to make way for dive site and truck turning circle, plus destruction of various golf courses e.g. Cammeray and Balgowlah.

Should we be worried about development? I’m worried.

Elizabeth Farrelly points out some sad truths in this article on Saturday 27th February 2021.

<https://www.smh.com.au/politics/nsw/are-you-stoked-by-nsw-planning-vision-don-t-be-beneath-its-friendly-cloak-lurks-jack-the-ripper-20210226-p5762f.html> SMH 27/2/2021 Elizabeth Farrelly

“Design-led? Stokes has been Planning Minister (or assistant planning minister) for five of the past seven years. If he had any genuine interest in beauty, environmentalism, consultation or connection to country we’d be seeing it by now.

Instead, we have a city scarred by 10-lane motorways through parks and neighbourhoods, by endless

toxic tunnels where signs warn not to breathe the air, by relentless metastases of 40-storey tower blocks jammed on every site a developer has been able to grab. We have public housing being rampantly redeveloped as private, sweet little train stations suddenly replaced by five-storey behemoths, bureaucrats sacked for refusing to fell thousands of highway trees, sprawl around virtually every country town, new coalmines approved apace and farmers forced to defend their land from huge mining corporates. Stokes' reign is one of the most destructive the state has seen.

Meanwhile, Stokes' [accelerated rezonings](#), [fast-tracked approvals](#), land-clearing and [expanded complying development](#) – all on a pretext of COVID-19 – continue apace. Consultation? Not likely.

Stokes himself may be either sincere but ineffectual, or insincere and disguising destruction. Weak or cynical. You choose. Regardless, one planning law is immutable. Words are cheap. By their deeds shall ye know them.”

In conclusion I object to the inadequate contents of the EIS and to the Beaches Link Tunnel project going ahead on several counts.

The EIS is out of date. Sufficient data has not been considered with the significant social changes over the last Covid impacted year.

The Business Case doesn't appear to stack up, the project is too expensive and the benefits are unsubstantiated.

Public Transport options have not been suitably considered. Alternative options do not appear to have been adequately addressed.

The environmental damage is too high for Sydney's precious natural habitat and waterways as compared to the benefits proposed (not even guaranteed.).

Next Steps:

My understanding is that as part of a process set out in the EP&A Act 1979, the DPIE now reviews the submissions to the EIS and is able to challenge the claims and assumptions of TfNSW in its description of how the project will be built and its claims on the environmental risks.

I request that the DPIE fully considers the needs of the Northern Beaches (less than 270,000 residents) for transport infrastructure against the significant needs of the whole of NSW.

I request that the DPIE revisit the Business Case for the BLT/GHF project with an open mind and reconsider the opportunities that \$14 billion could bring with public transport solutions and a 21st Century approach to carbon emissions.

Ann Collins