

Beaches Link and Gore Hill Freeway Connection Project

Please find submission below which raises concerns that the proposal is inconsistent with a significant number planning priorities contained in relevant key strategic planning documents, and Departmental Planning Circulars and Guidelines:

North District Plan

- **Planning Priority N6 – Creating and renewing great places and local centres, and respecting the District's heritage**

Actions:

19e. recognising and celebrating the character of a place and its people

Bringing more traffic into Manly will alter its character by promoting further growth of the centre and increasing traffic congestion, although we are not sure that your traffic consultant will find that there will be no additional impacts and there's 'nothing to see here'.

- **Planning Priority N10 – Growing investment, business opportunities and jobs in strategic centres**

'Manly strategic centre includes cultural, tourist, retail and entertainment activities for residential as well as local and international visitors'

Actions:

36. Provide access to jobs, goods and services by:

e. balancing the efficient movement of people and goods with supporting liveability of places along the road network.

Comment:

Increased car usage, which this project promotes, is not an efficient or sustainable way to move people and goods.

Additional traffic into Manly centre is not consistent with this Planning Priority. Additional traffic does not support the liveability of places along the road network, namely, Balgowlah Boys High School; Balgowlah Shops; and Fairlight Shops.

This proposal will make travel along Sydney Rd and Manly town centre dangerous for cyclists and pedestrians, in turn encouraging even further car use. What about more bike lanes instead?

AND

Actions: *Strengthen Manly through approaches that:*

a. Further develop Manly as a cultural, tourist, retail and entertainment precinct

b. Improve public transport connections

Comment:

In relation to 'a)', additional traffic into Manly town centre will diminish Manly's attractiveness as 'Sydney's premier seaside destination' by promoting traffic and growth, thereby altering its unique, strong sense of character – refer to the DPIEs own local character guidelines and elsewhere in this submission.

In relation to 'b)', this project does nothing to improve public transport connections. In fact it will undoubtedly lead to increased private car usage.

- **Planning Priority N13 – Supporting growth of target industry sectors**

Actions:

55. When preparing plans for tourism and visitation, consider:

b. enhancing the amenity, vibrancy and safety of centres and township precincts

Comment:

This project will, as demonstrated around the world, encourage car usage (Los Angeles to name one). Additional traffic into the northern beaches and Manly town centre will impact amenity, vibrancy and safety, particularly within Manly town centre and along Sydney Rd through the communities of Balgowlah and Fairlight.

- **Planning Priority N20 – Delivering high quality open space**

Actions:

73. Maximise the use of existing open space and protect, enhance and expand public open space by:

a. providing opportunities to expand a network of diverse, accessible, high quality open spaces that respond to the needs and values of communities as populations grow

Comment:

The Minister's portfolio now includes protecting and enhancing open space. However, this project does not 'protect, enhance or expand' public open space! Just the opposite in fact. Balgowlah oval which is used extensively for community sports throughout the year will have a second major road next to it and it appears that Balgowlah Golf Club will no longer exist, with no mention about this golf course in Chapter 5 – Project Description.

Please note this area is also identified on the Sydney Green Grid for recreation purposes (area number 41).

Department of Planning, Industry and Environment – circulars and guidelines

- **Planning Circular 18-001 Stepping up planning and designing for better places: respecting and enhancing local character**

'Regional plans should support local character by:

Acknowledging that areas with a strong sense of local character are desirable place to live and work and support strong communities, and that this should be an objective in planning for all communities.'

Comment:

Manly and the northern beaches do have a strong sense of local character and are desirable places to live **because** of their character. This proposal will inevitably impact this character in a negative way by turning a relaxed seaside community into an urban beach environment for tourists to visit en-masse like Surfers Paradise. This would lead to Manly Corso becoming even less economically diverse (and less culturally unique and desirable) by encouraging even more souvenir, fish and chip, kebab and ice-cream shops! The consequences of this proposal will clearly not increase a sense of local character or protect it. It is a complete contradiction with the Department's own advice.

- **Local Place and Character Guideline [Department of Planning, Industry and Environment]**

The guideline poses the following key considerations:

'Parking At-grade/ Above-grade/ Below-grade/ Permeable parking

Key considerations for parking are:

What type of public parking is available in your community, and is the parking located where it is needed?

Is there enough public parking in your community?'

Comment:

This proposal will inevitably increase traffic flows into Manly town centre. What provisions for car parking are proposed? Please note that the community strongly opposed a recent proposal by Council to construct a car park under Manly Oval. This is a solid indication that the community DOES NOT WANT MORE TRAFFIC IN MANLY TOWN CENTRE.

Northern Beaches LSPS

This Proposal is inconsistent with the following Planning Priorities contained in the Northern Beaches LSPS:

- **Priority 2 – Protected bushland and biodiversity**

The exit point on the Burnt Bridge Deviation is in close proximity to an area mapped on the Terrestrial Biodiversity Map in the *Manly Local Environmental Plan 2013*. This green corridor is home to a colony of grey headed flying foxes, a threatened species.

Grey headed flying foxes are like bees in that they are essential pollinators. They are the only species that pollinate trees at night – when many Australian trees need to be pollinated, and help to regenerate our forests and drive biodiversity (<https://www.animalsaustralia.org/features/why-bats-need-your-love.php>).

Grey headed flying foxes rely on an array of sounds, smells and visual cues to communicate with each other particularly for locating their young in a large colony. All bats rely on their own odour for social communication. Each species of bat has its own sound 'signature' and even the young juveniles learn its call and how to use it (environment.nsw.gov.au)

The exhaust from the ventilation stack and noise from the exit road will negatively impact the crucial senses of hearing and smell of this threatened colony of Grey headed flying foxes that live along Burnt Bridge Creek, in turn potentially affecting pollination of native vegetation in the local area.

- **Priority 5 – greener urban environments and Priority 6 – high quality open space for recreation**

Comment:

This project cuts its way through two places of high-quality places of recreation – Balgowlah Golf Club and adjoining Balgowlah oval and is therefore inconsistent with these priorities.

- **Priority 7 – lower carbon community**

Comment:

Promoting road infrastructure promotes the use of cars which, of course increases emissions, a blatant contradiction with this priority.

- **Priority 17 – local character**

*Principle: Recognise heritage and culture as **fundamental** aspects of the identity of place, including identification of places and items which contribute to the significant character a place.*

AND

- **Priority 26 – Manly as Sydney's premier seaside destination**

Principle: Protect and enhance Manly's character, identity and social significance

Comment:

Manly is a premier seaside destination **because** of it's character. Encouraging more traffic, will provide the infrastructure for additional growth as Manly will be 'better connected'. This will fundamentally alter the character of Manly. On the one hand we have 'local character is fundamental' (priority 17) whilst on the other hand this development application will hugely impact Manly's character and surely detract from it being a premier destination.

It is a known phenomenon that places which are harder to get to tend to maintain their character. For example, contrast Clacton/ Margate/ Southend with Southwold, in Southern England to give you an idea of what impacts 'greater connectivity' can have on local character. Southwold was purposefully not connected by road or rail and has successfully retained its character and unique heritage, unlike Clacton/ Margate/ Southend which are well connected by rail from central London. Please take the time to do a "google drive-by" of these seaside towns to confirm this.

- **Priority 20 – Sustainable local transport networks**

Comment:

A project that promotes car usage is not sustainable and therefore inconsistent with this priority. Additional traffic will flow onto Sydney Road and increase traffic within Manly town centre. How is this additional traffic to be accommodated within the centre?

This proposal will make travel along Sydney Rd and Manly town centre dangerous for cyclists and pedestrians, in turn encouraging even further car use. A sustainable local transport network should not make active transport less desirable.

CONCLUSION

To ensure the impacts of this proposal are assessed to the fullest extent possible under Part 5 of the *Environmental Planning and Assessment Act 1979* we are requesting that the following reports be independently peer reviewed:

- Traffic;
- biodiversity;
- air pollution;
- economic impact assessment; and
- social impact – has this project considered the DPIEs *draft Social Impact Assessment Guideline*, currently on exhibition? If not, as it is being exhibited, this guideline should be implemented.

Thank you for your consideration in these matters.