

Beaches Link Tunnel Project Submission

from Denise Gardner

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The Beaches Link Tunnel will result in undesirable and irreversible changes to the landscape, environment and amenity of our local area and will negatively impact the entire northern beaches. The project design shows a reckless disregard for the local community, coming at a huge loss and cost for limited gain.

If the goal of the tunnel is to relieve traffic congestion on the Northern Beaches and lower North Shore and significantly improve travel times, then the project is an outdated and expensive. Despite some minor changes to the project as shown in the recently released EIS, there is little consideration given to alternative less disruptive solutions such as public transport options.

In addition, it has become apparent that the EIS has not provided an accurate and transparent assessment of the tunnel outcomes.

Based on my extensive reading and community and subject experts' consultation, it is clear to me and many others, traffic congestion will not be relieved despite the well documented huge financial and social impact.

I have been a resident of Paris St Balgowlah since 1984. Our cul-de-sac opens onto the golf course which our close community views as an extension of our street, an area for the children and dogs to play and the adults to socialise. Since the tunnel was announced I have learnt how the residents in all the streets surrounding the golf course, including Brighton St, Westlake Pl, Pickworth Ave and Dudley St are similarly close communities who enjoy access to the Balgowlah Golf Course (BGC) and Burnt Bridge Creek corridor (BBCC). I am intimately familiar with the area, having enjoyed the amenity of the golf course and creek corridor on a daily basis, whether playing golf, walking our dogs when golfers are not using the course or enjoying the wildlife. Access to this area has always been important for our community's physical and mental wellbeing, particularly so during the Covid-19 pandemic and lockdown periods. Along with close ties with my neighbours, it is the main reason we remain living here. In a street of 15 households, the average residency is 42 years. I object to the loss of this much treasured and important community open space and green environment to a poorly conceived project which will not solve the traffic issues and will come at a huge expense financially, environmentally and socially to the community.

I object strongly to the Beaches Link Tunnel on many grounds including

- loss of amenity for a highly active community
- environmental degradation and loss of vital wildlife habitat

- poor outdated tunnel design, especially the lack of tunnel ventilation and stack filtration
- the impact of construction on the community for 5-7 years with limited gain
- lack of consideration of public transport solutions
- poor business case which is based on flawed data.

DENIAL OF REQUEST FOR EXTENSION OF SUBMISSION DATE

I object to the DPIE refusing to grant an extension to the submission date for objections to the project and the inadequate community consultation project. The extension was not granted despite significant factors including the EIS being released just prior to Christmas when local schools and businesses shut down, the Northern Beaches lockdown then the unsatisfactory Virtual Information sessions where Q & A was frustratingly inadequate. No face-to-face community consultations were offered due to Covid-19 restrictions and the virtual sessions were a poor substitute for the purpose of an EIS review. The EIS is a massive and daunting document not easily understood or accessed by the majority of the community and still lacking important and relevant details of planning and construction. I request an immediate extension to the submission date and an independent assessment of the TfNSW performance through discussion with all stakeholders and the community.

FLAWED TRAFFIC DATA AND PROJECTED TIME SAVINGS

I object to the flawed claims by TfNSW regarding travel time savings for Northern Beaches residents and traffic reduction along Spit and Military Rd based on their flawed forecast traffic volumes for 2037. Many factors were not taken into account when the traffic forecasts were created several years ago.

I request the following factors and likely future trends are considered when calculating the traffic volumes and time savings if the tunnel is built

- the increased congestion in areas leading to the tunnel, especially Balgowlah and Manly Vale which will slow travel time to and from the tunnel
- the cultural shift to work from home (WFH) which has grown dramatically over the past year due to Covid-19 restrictions. This has resulted in reduced traffic numbers and fewer travels in peak times due to greater flexibility of work hours and location. If the tunnel project proceeds, the WFH culture will likely increase dramatically and become entrenched as the result of locals attempting to avoid the construction zone and traffic disruption which will occur for 5-7 years.
- the impact of the B-line bus and the new Dee Why to Chatswood Express Bus Service

I object to the inaccurate claims by TfNSW regarding traffic volumes. Further analysis will reveal it is a very expensive and unnecessary infrastructure project. For example, the EIS states that according to traffic modelling, the traffic along Military Road will decrease by 11% once the tunnel is completed. When the impact of the new bus services and WFH

culture are considered, the real reduction in traffic flow is likely to be less, making the project goals even less obtainable. The money could be better spent in expanding the public transport options and establishing community WFH Hubs.

I request that the DPIE or TfNSW commission an independent review of the traffic flow forecasts for vehicles travelling to the city and beyond along the corridor roads to the Spit Bridge from 2021 – 2051. The forecast needs to consider the factors listed above.

ALTERNATIVES INCLUDING WESTERN HARBOUR TUNNEL (WHT) ONLY OR PUBLIC TRANSPORT

I object that the EIS process has not fully evaluated the business case option of the Western Harbour Tunnel without the Beaches Link tunnel (if that project must proceed) and request this option is comprehensively evaluated.

I object to the lack of evaluation of Public Transport alternatives. This option was not considered in the concept stage and has been dealt with very briefly in the EIS.

I request the cost-benefit analysis of Public transport options be done then publicly released.

ENVIRONMENTAL ISSUES

The environmental impacts of construction and operation of the tunnel under the current plan are permanent and unjustifiable.

I object to the destruction of Balgowlah Golf Course (BGC) which is a valuable resource, with usage and membership increasing dramatically over the past year. BGC is used for exercise and recreation at all hours every day of the week by all age groups, whether it be playing golf, walking dogs, walking, jogging, kicking a ball, etc. Playing fields are proposed to replace part of the golf course, but compared to the existing golf course, fewer people in our community will benefit and the sporting fields will only be used at limited times throughout the week. The project has totally misrepresented the final impact on this most treasured community asset.

I object to the environmental destruction during and after construction. The loss of habitat through wanton destruction of mature trees and high value bushland is appalling and will result in loss shade and impact local microclimate and biodiversity.

I object to the removal of the golf course dam. It is a major source of drinking water for the local endangered grey-eared flying fox colony and habitat for water dragons, extensive birdlife, eels and turtles. The EIS indicates there is no plan to replace the dam and its removal will have a huge impact on wildlife.

I object to the lack of assessment to the damage to the Burnt Bridge Creek riparian and wildlife corridor extending from Seaforth to Manly Lagoon and Manly Beach. According to the EIS, construction of the tunnel will result in the permanent loss of up to 96% of the base water flow. The creek will essentially become a storm water drain and the water quality in

Manly Lagoon and at times Manly Beach will also suffer. This appalling degradation will effectively result in the death of Burnt Bridge Creek with huge hydrological and ecological impacts which would be a disaster. The EIS even declares in its own publication in Appendix O, pg 45, *'the creek is a vital ecological corridor.... that provides a range of important habitats for a diversity of local flora and fauna'*

I object to the destruction of 12+ hectares of valuable high-quality bushland including threatened Duffy's Forest and habitat resulting from the widening of Wakehurst Parkway for the tunnel portal. Inadequate drainage will likely result in contamination and sedimentation of Manly Dam. The proposal to offset through a "swap" does not help the endemic species in this important natural area, such as the Gondwanan Climbing Galaxias Fish, the threatened Eastern Bent-wing Bat or the Eastern Pygmy Possum.

I object to the damage which will be caused to Middle Harbour resulting from the Coffey Dams and the installation of the immersed tubes. The disturbance of toxic sludge will grossly impact the marine environment, despite the planned attempt to contain it with floating curtains. This will have disastrous and unacceptable impacts on the local communities and recreational users around Clontarf, the Spit, Sandy Bay and Middle Harbour and must be reconsidered.

I object to the number of trees impacted or potentially impacted by construction. Apart from the obvious habitat and air quality benefits offered by mature trees, they help protect visual amenity, reduce light pollution and offer some noise protection. Appendix V pg 160 of the EIS states the local area, particularly the area east of Balgowlah Golf Course will be highly impacted by light at night-time both during construction and when the tunnel is operational.

Along with these objections, **I request** an accurate assessment is made of the usage of Balgowlah Golf Course now compared to the restricted use if developed into playing fields to allow full appreciation by all stakeholders of the final outcome.

I also request TfNSW procures an independent and unbiased expert assessment to thoroughly assess the environmental impacts on Burnt Bridge Creek corridor, BGC, Wakehurst Parkway/Manly Dam and Middle Harbour. If the project must proceed, I request independent experts are employed to rethink and determine a design solution which does not result in the permanent degradation of these vital areas. I request the trees are recognised as a valuable resource and retained where possible, with protective collars placed around vulnerable trees and construction such as digging and vehicle movements are carefully planned to allow retention of many more trees than proposed. I request the BGC dam is recognised as a valuable wildlife resource and retained.

LOCAL IMPACTS

I object to the proposed project as it will result in rat runs and significantly increased traffic congestion in Manly Vale and Balgowlah during construction and once completed. This is acknowledged by TfNSW, along with the subsequent need to extensively upgrade local

roads to cope and to recover from construction degradation. Critically, little work has been done assessing the impact on the local road network.

I request that if the tunnel proceeds this assessment is done and state government funds the necessary work, not Northern Beaches Council.

I object to the huge impact of construction on the local community. Excess noise, dust and vibration levels will impact the wellbeing of thousands of residents, along with potential damage to some homes. Tunnelling will occur 24/7. Truck movements will be extreme with at least 40-50 truck movements per hour at each site. The trucks will carry the tunnel spoils along arterial roads for 5-7 years adding to the reported congestion. Despite these issues, the EIS does not provide detailed information on the mitigation measures. Chapter 10 of the EIS pg 10-14 talks about “reasonable and feasible” but who determines this? As revealed in the recent parliamentary inquiry into the construction of WestConnex Stage 1 and 2, there were many breaches of rules by contractors which were only determined through reporting by local residents. Normal working hours have been established but what circumstances allow night work to be conducted “when required”? What protections have been put in place to avoid breaches of working hours, truck movements, etc with this project? Who will monitor the work sites? What construction noise mitigation is planned such as offering double glazing to impacted residents?

I request real consultation with the community to develop appropriate and enforceable restrictions that are not determined by the contractor but by an independent arbitrator then monitored by TfNSW, with appropriate penalties imposed for breaches.

I object to the location of the Balgowlah site road during construction and once the tunnel is operational. The road will be within 1 metre of the existing oval and within the footprint of the existing cricket nets. While the oval is the only local playing field for Balgowlah Boys High School and St Cecilia school, the EIS concedes the appeal of using the oval during construction will reduce. I believe it will also make it unsafe and unusable during this period. I request the access road is placed 15 metres further west and sunken below the proposed level to ensure safe use of the oval during and after construction and allow retention of more trees to ameliorate the increased light and noise from traffic for residents and users of the oval and scout hall.

I object to the height of the stack and the footprint of the buildings and the resultant visual impact. In reality the stacks will be much bigger than the scale offered in the EIS and visual impact of the project is understated.

I request revision and accurate openness with the community regarding the design.

I object to the clogging of local streets by construction workers car parking. This has been the reality on many projects including the Northern Beaches Hospital.

I request the provision of adequate onsite parking with parking restrictions in local streets for non-residents.

TUNNEL AND STACKS

I object to the lack of consideration given to the local community and nearby schools including Balgowlah Boys High, St Cecilia's, Anzac Park Memorial school and Seaforth Public regarding ventilation and filtration. The EIS contains many pages of justification as to why there has been fundamentally no change to the tunnel and stack design. The tunnel remains unventilated and the stack unfiltered despite growing evidence of the health impacts. On questioning during the Virtual Information sessions, we were advised that comparable tunnels in NSW use the same longitudinal ventilation system but no comparison was offered with other countries or states. Our research has determined this is not standard practice internationally. Tunnels of similar length are ventilated, and the stacks are filtered, with greater concern shown for communities. We were also advised the air quality issue which exists with the M5 East tunnel will not be a problem as the Beaches Link Tunnel will have 3 lanes instead of two, offering a larger cross-section of tunnel. Surely this benefit is negated by the number of vehicles using the tunnel. Also, some sections of the tunnel will only be two lanes wide.

I object there is no intention to filter the stacks. There are flaws with the modelling as it is averaged over time rather than considering the peak times. More of a concern is the lack of consideration given to the credible growing medical evidence that particles smaller than 2.5 have health impact and overall, there is no safe level of exposure to toxins. Who will want their children playing sport within 100 metres of an unfiltered stack?

I request the tunnel is actively and effectively ventilated throughout the entire length and the stacks are filtered to the highest standard available.

CONCLUSION

- The Beaches Link Tunnel has been proposed as the solution to the Northern Beaches and Mosman Council road woes. However, it does not consider the changes in work culture including work from home or local work hubs which will lessen the peak hour traffic flow. The business case to justify the need and benefit of the proposed tunnel is poor.
- Building the tunnel will result in induced demand and funnelling of traffic, resulting in more congestion and longer delays on local roads which will cancel out any expected gains in travel time.
- During the construction phase and once operative, there will be irreparable loss of habitat and environment, damaging our precious local environment and impacting the amenity of the area and wellbeing of the community
- The fundamental design including the unfiltered ventilation stacks and the unventilated tunnels needs to be comprehensively revised.