

Attention: Director, Transport Assessments
Planning & Assessment,
Department of Planning Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

26th February 2021

Objection:

Beaches Link and Gore Hill Freeway Connection

SSI-8862

As a resident of Fairlight, an Architect, an urban planner, a parent of students at NBSC Balgowlah Boys Campus and a lover of the special environment of the Northern Beaches, I object to the Beaches Link and Gore Hill Freeway Connection for many reasons.

I will concentrate on the following key issues for this submission:

1. A new motorway is the wrong infrastructure to support sustainable future growth of the Northern Beaches
2. The project is being rushed for political reason despite zero business case and a low priority for Infrastructure Australia
3. Public information about the project has been very misleading
4. The impacts on NBSC Balgowlah Boys Campus pose a serious threat to the learning environment at the school, the safety of the boys and the mental and physical health of the school community
5. The environmental damage to be caused by the widening of the Wakehurst Parkway, the dredging of Middle Harbour, the removal of groundwater under the Burnt Bridge Creek and the loss of thousands of trees is unacceptable and deeply tragic.

1. A new motorway is the wrong infrastructure to support sustainable future growth of the Northern Beaches.

A growing Sydney will **not** solve congestion by building more toll roads. Forward-looking international cities are removing their freeways, turning highways into mixed mode avenues and investing in active and public transport to support future growth.

New urban motorways destroy the fabric of our cities, create more enormous traffic jams, encourage private car use over public transport and cost ridiculous amounts of money to build and use.

I would not object to construction chaos if new public transit were the result. But a new road, which promotes car use, increases pollution, will be congested in no time, and doesn't prepare our suburbs for the future? It makes no sense at all.

Our existing road network is huge but clogged with single-occupancy vehicles. We must make much more efficient use of the roads we have before pouring more concrete.

There are so many things that will make commuting easier. Frequent express buses in dedicated lanes, reduced fares, improved phasing of traffic lights, fast ferries, on-demand ride sharing, more T3 lanes, congestion pricing – these are all relatively cheap and easy-to-implement initiatives that will increase use of public transport, redistribute road space to buses for reliable commuting and reduce congestion.

And then start planning an extension to the growing metro system. A Chatswood-Dee Why line would be a city-shaping and progressive piece of infrastructure that would unlock so much development potential, take cars off the road and allow easy access to the rest of Sydney for EVERYONE.

Data indicates that people will abandon their cars if public transport is quicker. This is the only way forward.

2020 has shown us that travel and work patterns can change very quickly and we still do not know the long-term implications of increased home working. There is plenty of evidence that WFH in one form or another will be a permanent feature in society. A number of large employers (including TfNSW itself and many government departments) have officially adopted a hybrid form of WFH. However, TfNSW have evaluated the movement to WFH effect as “temporary” in relation to the Northern Beaches. This must be re-assessed.

Development is coming. I support increased density and new mixed-use hubs in the Northern Beaches, which will provide jobs, services, and affordable housing in our low-density suburbs, reducing the need to travel. However, there is not space for everyone to get everywhere by car. The Northern Beaches Council 'MOVE' strategy aims to reduce the usage of cars by 30% by 2038 (refer to pages 12). How can a road tunnel,

which will divert funding from other transport improvements for decades to come, support this aim?

In addition, NSW has committed to Net Zero by 2050. A modern public transport solution would support this target.

I object that Transport for NSW has failed to consider other options to achieve a reduction in congestion and improved travel times for the relevant communities. Multiple transport options must be modelled and compared. Instead the gross simplicity of 'Do something' (i.e. the WHT and BL in combination) and 'Do nothing' has been presented.

In order to make this a livable city for the future, you have a once-in-a-generation opportunity to make the correct long-term decision and provide public transport, preferably by rail, as other progressive cities around the world have done.

It is essential that you press 'pause' on this project to expand the Westconnex monster and re-consider all the options for getting the Northern Beaches moving, both now and in the future. An independent cost-benefit analysis must be conducted for all transport options and publicly released. The must include a full evaluation of the option of Western Harbour Tunnel but not Beaches Link, an extension to the Metro, the use of trackless trams and driverless electric buses and proper BRT systems.

2. The project is being rushed for political reason despite zero business case and a low priority for Infrastructure Australia

I recognize that delivery of the Beaches Link was an 'election promise' but it is not right to push for its commencement by 2023 when the business case and design are so flawed.

The EIS claims that the project is necessary and a full assessment has been done. This is false. WHTBL falls into the fourth and bottom category of priority and **it does not yet have a completed or published business case**. The Upper House has called for the business case on several occasions and it has not been presented to Parliament, Infrastructure Australia or the public. There are 25 more urgent infrastructure priorities on the Priority Initiatives list. Many are public transport or rail freight initiatives that would take vehicles off our roads. Most are located in Western Sydney and Regional Areas – the areas that most need the government's investment following drought, bushfires and the economic downturn due to COVID-19.

I object to the timeline for the EIS. Although the documents were put on exhibition in December, Northern Beaches residents were pre-occupied by the Christmas holidays and another COVID lockdown. It was February before the community began to engage

with the 12,000 page EIS and many residents still have no idea what is coming.

Any further toll road projects should be on hold until the Metro is completed in 2024. The likely success of the Metro projects will no doubt show that the road tunnels will be white elephants. A delay would allow time to assess the financial risk of the tunnel projects and the evidence of harm to the community with unfiltered ventilation stacks, construction noise and vibration while public transport alternatives can be properly assessed.

3. Public information about the project has been very misleading

There have been many changes to the design of the Beaches Link around the Seaforth and Balgowlah portals without any consultation. **This is not acceptable.** The community needs to understand the impacts and make future plans based on a fixed design. The project must be put on hold while detail engagement occurs on the new design.

The high-level summary of the EIS shows very sketchy maps of the project and images of the portals are misleading. For example, the unfiltered ventilation stacks are shown as specks in the landscape, not 25m high chimneys.

Glossy information brochures show buses nipping along on dedicate lanes and claims of incredible time savings are thrown up.

There is no public transport lane in the tunnel, no new bus services are guaranteed and the EIS doesn't promise quicker trips on public transport. It isn't in the operator's interests to "turbocharge" public transport, which was promised by Member for Manly, James Griffin MP.

I object that the summary information presents a 'spin' on the travel time improvements rather than what the modelling shows and what people can really expect. An example is in the Community guide to the EIS where it says journeys from Balgowlah to the CBD are expected to be 38 minutes faster. However, this trip currently takes less than 35mins at peak time by bus. Buried deep in appendices, the EIS admits to serious extra congestion on roads feeding the tunnel. For example, the EIS models travel times along the Wakehurst Parkway from Oxford Falls, over Warringah Rd, and to the tunnel portal near Judith St, Seaforth during the morning peak in 2027. Without the Beaches Link tunnel this trip takes 4 minutes, 27 seconds, but with the tunnel, it will more than double to 10 minutes, 7 seconds (12). New sets of traffic lights on Sydney Road and Burnt Bridge Creek Deviation will quickly cause queues to build up in areas already jammed with cars.

It doesn't take too many of these examples in a total journey for all time savings from the tunnel to be eliminated.

I object to the project documents not aligning between detail and summary / synthesis. For example, the detail reveals a huge amount of greenhouse gas impact from the construction and operation. However the summary concludes that this is a sustainable development. It is the antithesis of sustainable development.

I object to the lack of transparency in the consultation process. The EIS is 12,000 pages of complex information. Just the introduction to Section 6 has a readability score of 17.8, meaning that it will be fully comprehended by only 19% of Australian adults. This is not good enough.

Community consultation has been inadequate for the purposes of the EIS process. An independent assessment is needed to examine the performance of TfNSW.

4. The impacts on NBSC Balgowlah Boys Campus pose a serious threat to the learning environment at the school, the safety of the boys and the mental and physical health of the school community

NBSC Balgowlah Boys Campus sits directly south of the Balgowlah Construction site. The students and staff will be impacted by noise, dust, traffic congestion, safety issues, parking problems and the probable loss of the Balgowlah Oval.

The school has grown rapidly over the last few years due to its excellent academic results. This upward trajectory is in jeopardy from over 6 years of very disruptive construction that threatens to send boys and teachers to other schools.

If the project goes ahead:

- **The NBSC Balgowlah Boys Campus must be listed as a 'Community Receiver' to ensure noise and air quality monitoring. This is a serious omission in the EIS.**
- TfNSW must establish a Working Group with NBSC Balgowlah Boys Campus and its P&C to provide a forum to identify and appropriately manage construction and operational issues for the Beaches Link Tunnel.
- The Working Group must be actively involved in the development of a Construction Traffic Management Plan and a Construction Noise Management Plan.
- The mitigation measures requested must be included in the Scope of Works for the contractor and be regularly reviewed/monitored by the Working Group.
- The Conditions of Approval for the project must include a requirement that the community communication strategy identifies Balgowlah Boys Campus and its P&C as key stakeholders on the list of people and organisations to be consulted during the design and work phases.

- TfNSW must provide funding for a paid Project Manager/Liaison Officer who will work with and on behalf of the school to manage Working Group activities, community consultation and engagement, media releases, and compensation/mitigation works and funding.
- Penalties must be imposed on the contractor(s) when acceptable air quality, noise and vibration levels are exceeded.
- The recent parliamentary inquiry into the construction of WestConnex Stage 1 and 2 found many examples of contractor breaches of the rules, relying upon resident reporting and complaints. They report Finding 14 “That the various noise mitigation measures offered by Roads and Maritime Services are wholly inadequate to substantially reduce heavy construction noise.” The protections for NBSC Balgowlah Boys Campus, and the Northern Beaches community as a whole, must be sufficient from the outset of the project.
- Provision of alternative off-site venues as close to the school as possible for exams for ALL year groups must be organised if the need arises, with bus transport provided, at no cost to the school or students. It is not yet known how bad the noise, dust and vibrations will be at exam times but plans need to be in place for unbearable conditions.
- The EIS states that 495 heavy truck movement will occur **every day** at the Sydney Road entrance to the construction site. Truck movements must be paused completely from 8am-9:30am every day, and 2:30pm-4pm (in line with 40km/hr school zone timings) to avoid conflicts with students arriving at and departing school on foot, by bike, skateboard, bus or car.
- No parking of motor vehicles by any contractors or site workers can be allowed in the residential streets surrounding the school in order to protect parking and access for residents, teachers and students.
- It is essential that Balgowlah Oval remains open at all times with safe pedestrian crossing of the new access road. The school is on a very constrained site, relying heavily on the oval for PE and recreation. TfNSW states that Balgowlah Oval will remain operational through the whole construction phase but the EIS concedes that the oval would have diminished appeal of use during this time. The access road must be placed at least 15 metres further west of its current position, ensuring safe use of the oval during construction. Trees surrounding the oval to the west and north must also be retained to improve the appeal of use of the oval over the lengthy period of construction.

The future amenity of the area around the school is a key concern. There are opportunities provided by the Beaches Link project to address some issues around open space and public transport.

- Northern Beaches Council and the NSW Government to collaborate with NBSC Balgowlah Boys Campus when designing the future facilities for the new open spaces. As the school is very constrained on its current site and has little open space, the creation of multi-purpose facilities for both sport and education that can be used

by the school must be a key outcome (e.g. community rooms could be used as teaching spaces, toilet blocks as changing rooms for PE). The open space development, if executed well, provides an opportunity to address some of the problems with the school's existing campus.

- TfNSW must install **new bus stops for the B-Line and other express buses** as they travel north and south through Seaforth along the Burnt Bridge Creek Deviation and Manly Road. Space could be created for a proper bus interchange around the entrance to Dudley Street, with a safe pedestrian crossing across the green space above the tunnel portal to the northbound stop. This would dramatically improve access to the bus network for Balgowlah Boys students and local Seaforth and Balgowlah residents.
- If operational air quality does not meet safe standards, following robust assessment by independent consultants, filtration devices must be retrofitted to the ventilation stack.

5. The environmental damage to be caused by the widening of the Wakehurst Parkway, the dredging of Middle Harbour, the removal of groundwater under the Burnt Bridge Creek and the loss of thousands of trees is unacceptable and deeply tragic.

Some of the most awful environmental impacts have been exposed by many hours picking through the EIS. For example:

- Wakehurst Parkway will be a 4-6 lane freeway across a narrow escarpment, causing ongoing pollution into sensitive creeks and waterways at Manly Dam and Garigal National Park. 39 football fields of bushland will be cleared as well as 2,000 trees. The road will be raised several metres in some areas - making it audible and visible, day and night, for miles around.
- The Burnt Bridge Creek will die as its flow is to be reduced by 96%, destroying a delicate ecosystem that supports threatened species including the flying fox colony.
- During construction, 425,000 litres of waste water will be washed into Manly Lagoon at Queenscliff every day.
- At Middle Harbour, toxic chemicals in the harbour sediment will be disturbed during dredging, posing a major threat to the marine environment and the amenity of Clontarf and Sandy Bay.
- Balgowlah Golf Course site will be completely cleared of vegetation and native habitats during construction to allow for parking for some of the 3000 workers daily, enormous road headers, a concrete batch plant, rock crushers and acoustic sheds.

This destruction forms the basis of many other submissions and I won't elaborate here.

It is essential that due diligence is taken to protect the waterways and native habitats during and after construction. The contractors must be locked into all mitigation commitments with huge fines for breaches. Restoration of construction sites must occur under the watch of independent experts to ensure that biodiversity is not lost forever.

To conclude, this is not a project that Sydney needs. To push ahead with the Beaches Link project would be a missed opportunity to transform Sydney into a world class, healthy and sustainable city with a strong public transport system. I would ask that an alternative public transport feasibility study be published before any further planning occurs so that impacts and outcomes can be fairly compared.

Yours sincerely,

Sarah Bickford

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Declaration of any reportable political donations made in the previous 2 years.

I have not made any reportable political donations in the past two years.