

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

Thank you for this opportunity to provide feedback on the EIS for this project.

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

### **PREAMBLE**

We have resided in Manly Vale for 30 years and have no plans to move. We have raised our family here and cannot conceive of a better region in which to live. We drive on the local roads, our children attend the local schools and we spend our recreational time in the great outdoors that surrounds us. We are particularly grateful for the foresight of people who acted to reserve and preserve the high-value bush and waterways – and we honour their legacy.

This is our home, and we value the amenity and community on offer – and to which we have tried to “give back”. In addition to the social aspects, we also highly value the local bushland and waterways and we have tried to contribute personally to its maintenance and improvement. We value our 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. Even from an entirely utilitarian perspective, maintaining the health of the environment is essential to guarantee the best quality of life for present and future generations.

**I object to the EIS**, and the current tunnel plan it is meant to support because the evidence simply does not indicate a net benefit – far from it.

We acknowledge that there is need for solutions to the many transport problems across the Northern Beaches, but we 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, 20<sup>th</sup> century solution to a 21<sup>st</sup> century problem.

### **OBJECTIONS**

1. The Beaches Link is a poorly conceived plan costing billions of (the public's) money to no lasting positive effect. Based on out-of-date data (2016 and earlier) and blinkered thinking, I object to public money being so poorly spent.
2. The opportunity cost of the project is not properly considered – further bringing into question the return on investment.
3. The economic stimulus generated by the Beaches Link is highly gendered. Maybe it would generate lots of jobs – but the vast majority would be just for men.
4. The Beaches Link would produce massive disruption to the road network in Balgowlah, Manly Vale and Seaforth areas for the 5+ years of construction. Platitudes such as “the long-term gain is worth the short-term pain” are cheap assurances put forward by politicians, public servants and contractors who don't have to live through it all. Insisting that NB Council must remediate the massive traffic snarls generated by years of construction is buck-passing of the highest order.
5. In the operational phase, the Beaches Link will simply shift the traffic congestion away from existing choke-points to new locations – many of these in the suburbs adjacent to the portals. There is no improvement implicit in this plan for transport within the Northern

Beaches – it is just about getting in and out of the NB, (and generating revenue for Transurban).

6. Induced demand and population growth would eventually wipe-out any travel time improvements during the early years of operation. Then what? Unlike public transport and creative government policy (e.g. encouraging WFH) a tunnel cannot be “adjusted” in response to changing circumstances.
7. The education (and hence the future of) thousands of students at Balgowlah Boys’ High would be horrendously impacted by the construction of the Burnt Bridge portal.
8. The ecology of the Burnt Bridge Creek, Manly Creek and Bantry Bay catchments would be seriously and permanently damaged by the Beaches Link – both during construction and operational phases. This aspect is the most troubling. Once lost, environmental integrity is almost impossible to restore. In contradiction to data in the report itself, the EIS consistently understates the degree of environmental risk and proposes solutions that “may” or “could” be implemented, (in other words, probably won’t). The last resort options: off-setting and bio-banking, are disturbingly prevalent in the EIS – (how do you compensate for destroying unique, protected Duffy’s Forest?) On-location solutions are far preferable. Major issues include:
  - 8.1 the drying up of Burnt Bridge Creek
  - 8.2 increased frequency of intense water flows with associated sediment and pollutants into the Manly Dam catchment
  - 8.3 significant, permanent lowering of water-tables
  - 8.4 enhanced “heat-island” effect around the tunnel portals and along the Wakehurst Parkway ridge
  - 8.5 kilometres of tunnels generating air pollution that would be vented into Burnt Bridge Valley, potentially being trapped beneath an inversion layer
  - 8.6 permanent removal of bushland habitat, particularly along Wakehurst Highway
  - 8.7 expansion of deleterious edge effects into more sensitive bushland and creeks
  - 8.8 inhibition of native animal movement by expansion of roadways
  - 8.9 native animal behaviour being influenced by roadway and portal lighting

#### **REQUESTED RESPONSE BY TRANSPORT NSW**

1. Do not proceed with the current Beaches Link proposal.
2. Reassess the economic basis for the Beaches Link using up-to-date data. (Covid-19 was a lesson in how quickly and extensively nation-wide behaviour and economic circumstances can and does change.)
3. Using fresh data develop a new business case and release it for public scrutiny and response.
4. 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.
5. Pivot expenditure away from private transport, and redirect to public transport. (Note the enthusiastic uptake of the B-line buses on the Northern Beaches – replicate this success rather than create another expensive traffic jam.)
6. If there is to be two tunnel portals – do NOT construct both at the same. Staggered construction would allow better traffic management during construction phase and reduce local congestion.

7. The following changes to the EIS should be made and go to another round of public consultation before any BLT plan is progressed to contract stage.
  - 7.1 In the EIS, adjust the stated environmental risk levels to the higher levels requested in the submissions by Northern Beaches Council (NBC), Manly Warringah War Memorial Park State Park Advisory Committee (MWWMPAC), and community environmental groups such as Save Manly Dam Catchment Committee (SMDCC) and Baringa Bush Residents Group. (All these submissions point out the obvious dissonance between the low environmental risks incorrectly assigned by the EIS, and the high risk indicated by the real-world data within the report.)
  - 7.2 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 %!)
  - 7.3 Investigate and report on the impacts of the Balgowlah portal lowering ground water by 6m. This is not well addressed in the current EIS – such serious draw-down would have a large impact on mature vegetation in the area, and have a inevitable knock-on effects (e.g. local heating and loss of habitat for birds, insects and flying foxes).
  - 7.4 Make the tunnel wall impervious to water so that pumping and watertable draw-down is rendered unnecessary.
  - 7.5 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.
  - 7.6 In association with 7.5 – improve the standard of roadway run-off retention and treatment along Wakehurst Parkway. The current proposal includes swales that would have been overwhelmed 12 times in 2020 (a dry year). This standard of protection is unacceptable and must be significantly improved. (The suggestion in the EIS that natural pools further down Manly Creek could be utilised as sediment traps is unacceptable – it is NOT a solution and needs to be removed from the EIS.) 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.
  - 7.7 In association with 7.5 – any Wakehurst Parkway realignment must be away from endangered Duffy's Forest community vegetation.
  - 7.8 Excessive lighting of streets and playing fields negatively impact the behaviours of insects and nocturnal vertebrates. The EIS does not adequately address this concern as it relates to new roadways and portals. It should be investigated further with a view to designing lighting at the tunnel portals and along the Wakehurst Parkway that minimises light spill into the night sky and into surrounding bush areas.
  - 7.9 The carbon footprint of the entire tunnel construction process needs to be audited, including: vegetation disturbance, fuel for machinery, and transport and manufacturing of materials (particularly embodied carbon in the massive use of concrete). Assess whether this footprint is consistent with the 2050 carbon neutrality target espoused by the NSW Government and lock-in carbon offsets as necessary. Compare the audited footprint with other transport alternatives – in particular enhanced public transport

options and incentives to entrench working from home as a permanent feature of employment on the Northern Beaches.

- 7.10 If portals are built, redesign the entrances to reduce the spread of hard surfaces and to remove the need for traffic lights (at Balgowlah). Vertical stacking of ramps would improve flow and reduce the “heat-island” effect of too much concrete and bitumen.

## **CONCLUSION**

Please reconsider the BLT plan.

Please address the many concerning issues raised (but not solved) in the EIS.

Please remember that short-term, unimaginative decisions result in long-term harm.

With all due respects, please remember that everyone at Transport NSW and indeed the whole of the State government are meant to be servants of the public and stewards of the land on our behalf.