Beaches Link Tunnel EIS Submission and Objections

My name is John Berry and I am a resident of Cammeray and I have attended a number of public meetings about the Beaches Link Tunnel and have read some of the EIS. I am very concerned about the multiple adverse impacts that this project would have on my community and the environment.

My objections are outlined below.

Air Quality

The problem - Objections

Particulate Matter as a result of vehicle emissions is already higher than what is recommended or considered "safe", particularly in suburbs surrounding the Warringah Freeway.

We are already living in an environment where levels of PM2.5 and PM10 is above the level of what is considered safe and the EIS demonstrates that this will continue well past the tunnel opening.

The government has a duty of care to do what it can to reduce these levels now that it has monitored and confirmed the issue.

Transport for NSW's conclusion that the air quality across the area on average will not be substantially worse is predicated on the assertion that surface level traffic will reduce. This assertion is contradicted many times in the EIS however via data which demonstrates increased intersection delays, the potential of additional toll avoidance, slower bus times, intersection failures, the admission that rat running will be required to access changed access arrangements to the freeway, an increased proportion of trucks through the area and several other factors.

Regardless of surface level changes modelling shows that pollution is redistributed as a result of the project. Some key corridors receive less pollution ie) Military Rd but sensitive receivers such as schools and sports fields receive more. Children are particularly susceptible to the health impacts of pollution and so this redistribution is unacceptable. The Western Harbour and Beaches Link program of works cuts through the largest school corridor in Sydney with 500-1000 pupils at approx. 26

schools. The precautionary principle must be applied to ensure the health of children across the project footprint.

Recommendations and Conditions

Alternatives to a major toll road should be examined, such as public transport.

Filtration of emission stacks should be made a condition of consent.

Pre and post construction monitoring of air pollution should occur at all sensitive sites.

Biodiversity

The Problem - Objections

To preserve and protect our native wildlife, Willoughby Council has designated Flat Rock Gully (FRG) as Zone E2 Environmental Conservation – Wildlife Protection Area.
FRG has been designated a WPA because it provides essential habitat for many of the native animals found in Willoughby. Flat Rock Gully Reserve is one such area as it provides significant habitats that support a wide range of birds - particularly small birds - mammals, reptiles and frogs that are disappearing from our urban areas.
This WPA which the community has formally set aside for environmental protection should not be destroyed or disturbed. To do so undermines the value of these designations of high biodiversity and leaves all protected areas open to destruction.

Below the proposed FRG dive site is an old and heavily contaminated dump site. The project would risk releasing heavily contaminated material and water into the environment which would be a risk to both human and wildlife health.

Artificial lighting and construction noise from the proposed dive site at FRG, according to the scientific literature, would be harmful to the native wildlife which inhabit or pass through the bushland. The impact would be most felt by threatened species. The NSW government is responsible for the protection of native wildlife.

Wildlife Corridors

Flat Rock Gully Reserve is also a key part of the network of wildlife corridors across Sydney required to maintain biodiversity. It is a major and central component of the east-west wildlife corridor between Middle Harbour and Lane Cove River Catchments. Bushland in Flat

Rock Gully contributes to habitat linkages that include Tunks Park, Middle Harbour, Northbridge Park, Cliff Ave Reserve, Bicentennial Reserve and Artarmon Reserve.
This wildlife corridor has been in place for many decades and is important to the wellbeing of wildlife across several catchments.

These corridors provide shelter, food and protection from predators and allow the movement of birds, animals and insects and the continuation of viable wildlife populations. They support biodiversity by allowing wildlife to respond to environmental variables such as access to water, food abundance or scarcity, population changes and the access to breeding partners which maintains genetic diversity in a healthy, local population. Many threatened and endangered native species owe their survival to these wildlife corridors.

The importance of wildlife corridors was most recently emphasised in the draft Design Guidelines released by the NSW Architect in association with the Department of Planning. The Guidelines advocate for the incorporation of a goal to protect, conserve and connect urban wildlife habitat in all relevant NSW legislation, policies, strategies, plans, and programs.[1]

Recommendations and Conditions
That the revised EIS be expanded to take into consideration the impact the construction site/s would have on local and regional wildlife corridor.

That the revised EIS assesses the impacts of destroying bushland which has been designated by the community and local government as a Wildlife Protection Area and set aside for Environmental Conservation.

That the revised EIS consider using already cleared areas, such as the Baseball Diamond adjacent to Flat Rock Drive in Bicentennial Reserve, rather than destroy a Wildlife Protection Area.

That the revised EIS include a full testing of the chemicals in FRG and complete a new risk assessment based on this information.

That the revised EIS include detailed plans to prevent contamination from the tip material or from accidental oil or chemical spills. The emergency remedial action to be taken if such contamination occurs should also be delineated.
These matters are required to be assessed as part of the Secretary's Environmental Assessment Requirements (SEARs).

Lack of Alternatives

The problem - Objections

The community can have no confidence that this project is in the public interest because the business case has been released.

There has never been a full business case assessed by Infrastructure Australia or even a business case submitted to Infrastructure Australia for Beaches Link separately to the Western Harbour Tunnel. Therefore, Beaches Link (in conjunction with the Western Harbour Tunnel) is classified by IA as an initiative rather than a project.

One of the main goals of the project is to reduce traffic congestion on Spit Rd and Military Rd.

However the proponent states the project will only provide marginal benefits for the Spit Road/Military Road corridor in any event with a 10% reduction from current travel volumes by 2037.
The EIS has not examined or weighed up the benefits of a frequent and fast public transport service from Dee Why to Chatswood compared to the benefit cost ratio of the BLT project

Recommendations and Conditions
1) That a revised EIS be prepared addressing the need of the project in light of COVID-19 impacts on relevant traffic volumes and population growth rates.
2)The BCR of a frequent and fast public transport service from Dee Why to the metro at Chatswood compared to the benefit cost ratio of the Beaches Link project, considered alone, setting out in detail how each has been calculated and including the business case for the Beaches Link.

Contamination

The Problem - Objections

I object to the high levels of contaminates which would be released into the environment and would pose a risk to human health and to wildlife.

Contaminated materials from the exposed tip site at Flat Rock Gully and/or accidental oil or chemical spills could be washed by stormwater or wastewater discharges into nearby waterways with serious consequences to plant life, wildlife and the Long Bay catchment.

Contaminants have been found in groundwater and surface water around the tip site

in Flat Rock Gully and there is a risk identified that these may move down the gully

as work proceeds and endanger human and wild life health.

Large amounts of wastewater would be produced from both construction and operational activities. Wastewater would be treated and flushed down creeks for example 117,000 L per day will be released down Flat Rock Creek via Tunks Park and 296, 000 L down Willoughby Creek from the Cammeray Site via Primrose Park. Specific methods regarding how the water will be treated given the contaminants detected and listed as likely ie) asbestos is not clear.

Recommendations and Conditions

That the revised EIS include a full testing of the chemicals in FRG and complete a new risk assessment based on this information.

That the revised EIS include detailed plans to prevent contamination from the tip material or from accidental oil or chemical spills. The emergency remedial action to be taken if such contamination occurs should also be delineated.

Loss of Green Spaces

The Problem- Objections

The proposed use of important bushland at Flat Rock Gully. This bushland site it is an important recreational area for the local community and became even more so during the covid era. As population in the Willoughby LGA will increase over the coming decades we have a responsibility to preserve and expand existing recreational and bushland green spaces.

The proposal to permanently remove or 26,000m2 of public recreation space in Cammeray Park (Cammeray Golf Course) and utilizing this land as the site for two substantial industrial sheds to house the Motorway Control Centre would be justifiably opposed by the community

Urban consolidation is occurring in the Nth Sydney LGA and as a result the population is increasing.

The net result of the BLT project should be an increase in available green space not a decrease.

Recommendations

The proposal should adopt the objective of improving and increasing green space both in terms of the total useable area and its ability to serve the variety of objectives set out in Greener Places. One example would be to construct a green bridge across the freeway linking Cammeray Park and Anzac Park.

The opportunity exists to improve the connectivity of green space in North Sydney. This would align with the NSW State Government initiative for the Green – Blue Grid.

Conditions of approval

There should an increase in the total area of useable green space in North Sydney as a result of the project.
Changes to the green space in North Sydney that result from the project should be better connected and of a higher quality than would be the case without the project.
A design investigation should be undertaken to discover the best option to meet the conditions above.

Traffic

The Problem- Objections

During Construction the traffic burden placed on residents, school children and motorists in Northbridge, Willoughby, Artarmon, Crows Nest, Cammeray, Naremburn, the lower north shore during the estimated5 years of the construction of the Beaches Link with the cumulative impact of the Western

Harbour Tunnel and Warringah Freeway Upgrade extending construction time across the

area for upwards of 8 years.

1. A large number of additional construction vehicle movements will be required across the

project servicing multiple construction sites. These sites are in and around schools, sporting

fields and school transport corridors which increases the safety risk. Heavy/ Light

2. 900 additional vehicle movements will be required on Flat Rock Drive/ Brook St daily. This is a narrow local road which services the connection from Northbridge via Naremburn to the

city. Dozens of schools on the Lower and Upper North Shore use this route as their school

bus route. Brook St is also a significant active transport link from Willoughby to North Shore

schools esp Cammeray due to zoning. Keeping kids safe along this corridor will be a challenge. Residents within the many dead end streets along this corridor exiting onto Brook St will also face a higher risk.

3. There is only vague assertions that the thousands of workers (employment of 15,000 has been quoted to service the Western Harbour Tunnel, Warringah Freeway and Beaches Link) will use public transport to access sites. Insufficient parking is provided onsite and not all sites are easily accessible by public transport. The Balgowlah site is a major launching platform for staff who will work at the sites and be bused down to the Spit via Spit Rd.

4. Whilst buses are used from Balgowlah the thousands of workers need to get there and may need to use Military Rd to do so.

5. Marshalling areas will be needed for trucks across all sites but particularly at the Flat Rock site. Marshalling should not be permitted on local streets and particularly not in the Naremburn Conservation Area due to the increased vibration risk. Trucks should not be allowed to idle while marshalling and every load should be tested and inspected to ensure contaminants are fully contained.

6. Trucks accelerating up a steep hill from zero is likely to create a substantial amount of diesel pollution - the health impacts of this have not been fully assessed. An alert style monitor should be placed at bicentennial reserve to alert the community to high levels of pollutants.

7. The noise assessment claimed that the trucks on Flat Rock Drive would not create more noise however the assessment does not appear to account for braking on a very steep hill - the noise assessment should be redone.

8. Spoil will be taken out from the Cammeray site across the bridge to an unknown location. On return the trucks will need to turn around at an undisclosed point - this may add more

trucks to roads around Willoughby than currently documented in the EIS.

9. Active transport routes across the route will be fragmented by the project and travel times will increase at Flat Rock, Cammeray and Artarmon.

Operation

1. The EIS confirms the Beaches Link is a Toll Road but there are no costings as yet. Costing and placement of toll gantries is essential to modelling traffic flows and predicting toll avoidance. Toll avoidance could become an issue as per the Inner West - tolling strategy yet to be confirmed however all other contracts have been 40-50 years with min. annual % increase in tolls.

2. A very low level of induced demand has been included in the modelling - research demonstrates that a higher level of induced demand is generally used for new expressways (up to 10%) which calls the modelling into question

3. The only local entry points for the Beaches Link are via Artarmon and Berry St North Sydney – no local time saved: 10mins to get to entry, 10 mins in tunnel, 10 mins to Dee Why or Manly = 30 min journey time.

4. The EIS makes it clear that this is not a local congestion solution – several local intersections fail or will experience a worse level of service both during and after construction as a result of the project. See the attached review for specific information

5. Does not achieve goals – only 10% reduction in short term on Military Rd based on FUTURE predicted traffic growth not today's levels. The growth model is not made available in the EIS so teh travel time savings and congestion reductions are unable to be verified. Where a road is already at capacity it is self limiting ie) future growth cannot overreach the ceiling capacity of the road and therefore a travel time saving or reduction cannot be claimed on this basis.

6. Traffic differential modelling in the EIS shows increased traffic flows around the Warringah Freeway and on the Beaches exit roads. The project appears to transfer pinch points to alternate locations rather than solving congestion.

7. Confirmed as a capacity solution not a congestion solution – the EIS prioritises freight and through traffic as a goal of the project above local congestion.

8. No dedicated bus lane in tunnel so is not a public transport solution – express buses aren't express if they are going at the same speed as cars and don't have their own lane.

9. No ability to be converted to rail – the project team have confirmed that the gradients are too steep along this alignment for the project to be converted to a rail option.

10. Prior to Covid TfNSW data shows that the daily average traffic across the Spit Bridge has been decreasing for the last 4 years, while during the same period the traffic on Mona Vale Road through to Macquarie Park has been increasing. The Beaches Link is addressing an ever decreasing problem as less people are travelling to and from the city from the

Northern Beaches.

1. There has been no assessment of traffic implications when the tunnel is closed for maintenance which would happen roughly monthly.

2. There has been no assessment of the pollution impact on surrounding neighbourhoods in the event of an emergency involving smoke or gas release (or other toxin). As there is no filtration there is no ability to prevent dispersion over school and residential communities.

3. Build the tunnels and more people use them, it moves the traffic congestion further down

the road. Increasing road reliance as the option given in this project is road.

4. The premise of these projects as we have seen demonstrated in the Westconnex is to see local roads return to local communities. Road tolling is a user paid system and some will spend money to save time, but in reality the continual use of expensive tolls become unavoidable to the vast majority of drivers, even though the state government offers rebates based on tolls and vehicle registration. That amount in tolls far outweighs the rego costs of a family car. There is likely to be an increase of traffic on our local streets as motorists avoid paying the tolls. This is currently the case in Leichhardt, Haberfield, Lilyfield, Ashfield.

Recommendations and Conditions

1. Release the business case for the Beaches Link and Gore Hill Freeway connection which has never been made public. This will tell us whether the Beaches Link is the most efficient, cost effective infrastructure to reduce congestion to and from the Northern Beaches.

2. A full reassessment of the traffic flows to and from the Northern Beaches needs to include data collected after 2016, data also needs to be collected on the number of Northern Beaches residents who work in the area and how many work from home.

3. A re-assessment of surface level traffic with all major local roads included in the operational modelling ie) Eastern Valley Way, the full span of Military Rd and Willoughby Rd was not included.

The surface road traffic assessment should then inform the pollution impact of the project as the

pollution contribution is not only limited to the stacks.

4. A reconsideration of a dive site along Flat Rock Drive due to the conflict between children and trucks and risks associated around safety, noise, dust, traffic etc If this is not reassessed ask for an overpass or underpass on Brook St to allow safe passage of children to school. Exclusion of trucks from the road during school bus times and pollution/ noise mitigation devices.

5. A comparative public transport options analysis to be published (via a reissuance of the EIS for public consultation) that compares the traffic implications both during and after construction of a mass transit solution.

6. Marshalling should not be permitted on local streets and particularly not in the

Naremburn Conservation Area due to the increased vibration risk. Trucks should not be allowed to idle while marshalling and every load should be tested and inspected to ensure contaminants are fully contained.