

## **Beaches Link Tunnel Project – EIS Submission**

I strongly object to the Beaches Link Tunnel along with many others in the wider community.

I have spent much time as a community leader through the development and planning process for the Beaches Link Tunnel. I estimate I have spent far more time answering questions, supporting others and sharing ideas with neighbours than any elected representative has done as part of this process. It is their job, not mine, to ensure the community knows the details about the project – and as a community, we have felt immeasurably let down.

The scoping and planning stages run by TfNSW (and RMS before them) have deliberately limited available information to residents, requiring ordinary people to have the time and motivation to proactively seek information from many sources.

The more people I meet with, I find their knowledge of the project is more and more limited, unaware of basic details like where the portals are located, whether there will be a toll, what will happen to traffic, that exhaust stacks are not filtered, and what construction will look like. People have been told that the project is simply “catch-up infrastructure” and it will not promote further development on the Northern Beaches – but we know this is not true. We are aware that significant housing development (beyond what would normally be imposed) is critical for the Beaches Link Tunnel to be even close to worth the costs to build.

Any Cost-Benefit-Analysis of the project (such as that calculated by the Balgowlah Residents Group submission) shows how tenuous the financial side of the project is – with a BCR of significantly less than 1 if anything other than generous allowances for traffic volumes are made.

Without appropriate knowledge of the project and its impacts in the wider community, government cannot assume they have the community’s approval – it is an abuse of people’s trust. This is not effective “community consultation”, and I object to the project on that basis alone.

### **Project Objectives**

The objectives of the Beaches Link Tunnel are stated as aiming to reduce travel times and congestion in the region.

Transport experts consistently agree that building more roads do not achieve these goals. Experts Dr Michelle Zeibots and Mathew Hounsell from UTS, who we have consulted with for this project agree that the Beaches Link Tunnel is will ultimately not improve travel times and congestion on the Northern Beaches – any gains will be lost within a short few years, at great cost to the public purse.

Media reports from July 2017 from leaked cabinet discussions have revealed to the public that a public transport alternative was not considered as an alternative, because commencing planning of the tunnel was purely a political decision.

I object on the basis that the construction of the Beaches Link will not achieve the stated objectives.

### **Estimates of Traffic volumes in the light of COVID-19**

The estimates of traffic volume projections used to assess the need and utilisation of the Beaches Link Tunnel are not reliable, and not sufficient to base a justification for the tunnel project.

From discussions and correspondence with TfNSW, it is revealed that the traffic volumes have been projected from the base in 2016, and not taking into account any more recent changes to travel patterns.

It is very clear that in the wake of COVID-19, most companies are providing more flexibility and efficiency for their employees by permitting them to work from home. Formal Work-from-home (WFH) arrangements have even been set-up for TfNSW staff, and many other government departments.

Studies of current traffic and transport use on the Northern Beaches has shown there remains around a 25% reduction in commuters – despite the threat of COVID-19 being minimal. Whilst private vehicles are back to around 90% of 2019 trips, public transport is down 40% according to Opal Card data - due mainly to restrictions on capacity.

Many research studies have been conducted with employers and employees, showing a desire to continue with WFH, giving flexibility to work from home for at least part of the week, and reducing costs of office space and equipment for employers.<sup>(1)</sup>

Despite all of this evidence from credible research, TfNSW have revealed in the calculations of traffic projections that they have assumed significantly increased numbers of people working from home are only a “temporary effect”. This would seem reckless with public spending - to plan to spend billions of dollars on a project without factoring in effects from the biggest impact on work in our lifetimes - COVID-19.

(1) Australians want to work from home more post-COVID (University of Sydney, Institute of Transport and Logistics Studies, Transport Opinion Survey, September 2020)  
<https://www.sydney.edu.au/news-opinion/news/2020/09/28/australians-want-to-work-from-home-more-post-covid.html>

## **Infrastructure Australia 2021 Priority List**

The Western Harbour Tunnel and Beaches Link continue to be rated in the lowest possible category as “Priority Initiative”, with many other projects escalating in importance above them.

Infrastructure Australia recognises there needs to be a change in priorities in the recovery after COVID-19, including the importance of regional, digital and power grid infrastructure. The 2021 release states “COVID-19 has had a significant impact on the way Australians use critical infrastructure. We have seen changing work patterns...”

As Infrastructure Australia is designed to be an independent advisor to government for the most appropriate project to invest in – responsible government must be guided by them.

## **Scenarios in Beaches Link EIS**

The scenarios used to compare the effects of constructing the Beaches Link and Western Harbour Tunnel projects versus not constructing the Beaches Link are invalid.

The scenario named ‘Do minimum’ does not include all current approved projects including the Western Harbour Tunnel. The scenario named ‘Do something’ is also irrelevant as it does not include the Western Harbour Tunnel.

It is invalid to not evaluate a scenario with the Western Harbour Tunnel and Warringah Freeway upgrade, but not the Beaches Link – as the Warringah Freeway and current harbour crossings are the source of significant congestion in the trips from the Northern Beaches.

We are informed that they are stand-alone projects, have separate EIS, and have had separate planning teams since 2018 in TfNSW. The scenarios in the EIS clearly demonstrate the ability for Western Harbour Tunnel and Beaches Link to be treated as stand-alone projects too.

It is disingenuous of the approval process to treat the Beaches Link as a “done deal” because the Western Harbour Tunnel has been approved, and to not honestly assess them as separate projects.

## **Consideration of public transport as an alternative**

It is critical to the community’s trust that a full and public comparison of alternative options are considered to the Beaches Link Tunnel. This must include options for B-Line or Light Rail from Dee Why to Chatswood and from Mona Vale to Mosman and to City/North Sydney.

I was disappointed that such a limited analysis was included in the EIS documents, stating that “buses have the capacity to make the road more congested”. The EIS completely

ignores that fact that getting private vehicles off the road by providing faster public transport would be the most effective and cost efficient in improving everyone's travel times. The Beaches Link tunnel only serves to lock residents into car dependency long into the future.

The EIS also says that the Northern Beaches is low density, but this is untrue along the major transport corridors where apartment buildings are 5+ storeys. Areas like these are better serviced by public transport, and will only create bottlenecks and more traffic congestion if they are forced to drive to reach the Beaches Link Tunnel portals.

It is ironic that the EIS documents detail potential benefits for bus services to use the tunnel, but then provides no plans or guarantees for them to do so. The community, and local councillors have been regularly lied to on this issue by our local MP. If the tunnel is built, the community demand dedicated bus lanes in the tunnel, appropriate priority bus lanes allowing fast access into the tunnel, and more bus routes using the tunnel. We were promised the tunnel would "turbocharge public transport", so if the is wasted on an expensive tunnel, we should at least get sufficient public transport.

### **Impacts to residents near construction sites**

We know that the experience of residents near construction sites close to West Connex have not been positive. The EIS statements about how to deal with resident complaints seem more about managing people, rather than helping them to fix the problem.

It should not be a resident's responsibility to monitor TfNSW's worksites to make sure contractors are in compliance for noise restrictions, equipment used, truck movements or car parking.

The community demands an independent advocate or arbitrator who acts on their behalf, that would need to be appointed external to government and contractors to guarantee their independence. Any advocate would need to work onsite and have the power to order changes or stop work if breaches to work conditions are found.

### **Mitigation measures to protect residents from construction impacts**

The construction sites will impact residents nearby severely, particularly now many people are working from home during standard construction times. The EIS does not fully address construction noise and vibration mitigation measures for particular streets or properties, so residents and school communities currently have no indication of whether they will be eligible to receive sufficient measures, or none at all.

As a condition of approval of the project, an independent assessment of noise and vibration impacts from construction on all surrounding homes with noise and vibration above management levels must be done and provided to property owners before construction commences. Where exceedances are found, appropriate mitigation strategies such as

double-glazing or noise barriers to eliminate these exceedances must be implemented before construction. Where exceedances cannot be eliminated, negotiation between the resident and TfNSW must be undertaken and if an agreement cannot be found, alternative construction methods must be undertaken.

At the Balgowlah construction site, the topography means that many residents are located higher than the site, and will look over the top of construction activities – making normal mitigation measures of noise walls or screens ineffective. The residents of Pickworth Ave, Westlake Pl, Sydney Rd, (what is left of) Dudley St and Serpentine Crescent will need as much mitigation as can be provided.

Due to the height difference, I ask that all tall trees between these streets and the construction site be deliberately retained, to give residents protection from light and some noise from construction.

On Serpentine Crescent, the barrier between Burnt Bridge Creek Deviation and Serpentine Crescent was built in early 2016, and virtually all trees were removed for ease of installation, despite assurances from RMS that “all trees possible would be retained”. The experience of people on the street was that noise had increased, so I contacted RMS and was told that the noise on Serpentine Crescent wasn’t loud enough to qualify for a noise wall, so they had built a shorter wall for consistency between Boronia and Hope St, who both qualified.

Therefore, the wall between Burnt Bridge Creek Deviation and Serpentine Crescent is not a noise wall – despite being described as a noise wall in the EIS documents. It is essential that noise mitigation measures on Serpentine Crescent be increased, in consultation with the residents most impacted, and taking into account the value of existing vegetation that is tall and provides extra protection for residents from construction light and noise pollution.

We know that the residents of Dudley Street had their noise wall built in 2016, and negotiated to retain the large gum trees between the street and the noise wall. Serpentine Crescent expects similar negotiation and consideration for mitigation measures on this project.

Such a pity all those large gum trees saved at such expense will just be demolished for this project.

### **Contribution to Climate Change**

The EIS documents state that in 2037, the Beaches Link tunnel will contribute 0.04% of the emissions of the entire state of NSW. This is a staggering figure, that a single road can be calculate this contribution – 2500 Beaches Links would cover all of the state’s emissions.

It is incongruous that the NSW government would spend so much time, effort and funding to reduce our greenhouse gasses with a target of Net Zero by 2050, then also approve a project like the Beaches Link. Whilst EVs are the future of private vehicles, limited support from various governments means that take-up will be too slow - it will be 2030 by the time

any real percentage of the vehicle fleet are EVs, and we will have locked in a large amount of emissions.

I object to the Beaches Link Tunnel on the basis that it is not consistent with NSW greenhouse gas emissions reduction policy.

### **Environmental damage**

I also strongly object to the Beaches Link Tunnel because of the irreversible environmental damage it's construction will cause.

The destruction includes;

- Burnt Bridge Creek being reduced to effectively a storm water drain with stagnant pools due to the reduction in groundwater flow, particularly in the section west of Hope St. The lack of reliable flowing water would mean the fish, eels, birds and small mammals (including echidnas) would either die or be forced to leave, and riparian vegetation would die and become more weed prone. A sign at the creek calls it "The lifeblood of Manly", and the bike path in this section is popular with everyone in the neighbourhood – bikers, walkers, dogs, kids. It's loss would be a permanent stain on the government that caused it.
- A tree particularly valuable that the community demands to be saved is a large Moreton Bay fig tree – thought to be roughly 100 years old (tree 922 flagged to be removed in the EIS).
- Wastewater from the construction sites and tunnel when operational would be released into both the Burnt Bridge Creek, Bantry Bay and Manly Dam catchments. Whilst the EIS states the intention is to remove silt and pollutants before it is discharged, there are no guarantees for the efficacy of this treatment, particularly during heavy rain events, because treatment ponds are of limited size. On the Wakehurst Parkway, the EIS concedes the wastewater can't be treated properly, because the site is too narrow – proving simply that the site is unsuitable.
- The number of trees needing to be bulldozed from this project is around 2000 on the Wakehurst Parkway, and over 400 on the Balgowlah Golf course. Particular species that are considered valuable are offset elsewhere – but it is relevant to ask where will this be? A tree next to a person's house is of no value to them protected elsewhere, and it is certainly of no value to any fauna that lived in it, or fed off it. Biodiversity offsets are not sufficient to compensate the community that lives around the sites of tree loss.
- The camp of Grey-headed flying foxes (a vulnerable species) at Balgowlah is on Burnt Bridge Creek because the animals need a reliable water source. The EIS states clearly that the tunnel will dramatically reduce flows in this creek, threatening the flying foxes. They will also be subject to excessive noise, well above their normal exposure levels. This would occur particularly during night surface roadworks, when vulnerable juvenile flying foxes are left at the camp while their mothers are foraging. The EIS states that 'a person experienced in

flying-fox behaviour' would be contracted to monitor them – but this is totally insufficient. The animals would not be monitored 24/7 and it would not stop trauma to the animals before it occurs.

- Toxic sediments on the seabed of Middle Harbour will be disturbed and released into the waterway as a result of building the cofferdams and immersed tunnel tubes during construction. Experts in the field state that silt curtains as suggested in the EIS are insufficient to protect the waterway from toxins above safe levels – they must be full depth, and even then, only reduce the risk of pollutants escaping. This will impact recreational users and swimmers, but also the diversity of marine life including White's seahorse, known to live at Clontarf pool.

The EIS does not provide sufficient measures to prevent these environmental disasters, in many cases they are unavoidable. This alone should make the Beaches Link tunnel untenable, and be rejected on that basis.

### **Traffic problems and rat-runs near portals**

If the ultimate goal of building the Beaches Link Tunnel is to reduce traffic congestion on Military Rd (as it is sold to the wider community) – then the projected mere 10% reduction in 2037 must be a joke. Virtually any transport project suggested could achieve better results than this, far more cost-effectively.

The projections used to estimate similar reduction on Eastern Valley Way, Roseville Bridge, and Mona Vale Road are purely speculative, as no behavioural research has been conducted to estimate these reductions. Who is to say how many people will decide to travel on the regular road instead of paying the toll, unless someone has asked them?

It is a well known trend that toll-aversion is increasing in Sydney, as we are the city with the world's most numerous and expensive toll roads. Independent behavioural research will be key to determining what travel patterns into the future will be. Have TfNSW done any on the Northern Beaches in the development of this project?

The EIS documents on traffic detail increased delays and congestion on various local roads, including Burnt Bridge Creek Deviation / Condamine St Manly Vale, Wakehurst Parkway and Sydney Rd / Condamine St Balgowlah.

These increased delays on roads and intersections include the majority of all major intersections in the region, and residents anticipate any time savings from using the tunnel will be eliminated by increased delays on local roads.

TfNSW acknowledges that traffic congestion and rat-running will increase in various streets around Balgowlah, Manly Vale and Seaforth due to the tunnel. This is the result of a poor design of tunnel portal, and the problem is left for council to try to fix, and residents to put up with – this is not good enough.

I object to the Beaches Link Tunnel portal design, because insufficient consideration has been given to the traffic impacts on feeder roads, and local residential streets subject to rat-running.

### **Unfiltered Ventilation Stacks in Balgowlah, Seaforth, Cammeray and Artarmon**

As the Balgowlah Residents Group submission shows, there are vast data inconsistencies in the air quality modelling data – both in the CR receptors data, and RWR receptor data, for all pollutants measured.

I consider it irresponsible to potentially brush off these as simple data errors – the community is supposed to have trust in the accuracy of this data for their health and safety. If some of the numbers are wrong in the EIS, what is to say they aren't all wrong? In research, it is known as garbage in, garbage out, and is clear that no logic or validity checks have been applied to the data outputs.

**As a result, the community can have no confidence that these modelled air quality figures are correct, for either the Western Harbour Tunnel or Beaches Link projects.**

The government refuses to consider having filtration in the ventilation stack that is so close to Balgowlah Boys High School, St Cecilia's and Seaforth Public Schools, as well as so many residents. The Beaches Link may well have the top 2 most closely populated exhaust stack in Sydney at Cammeray and Balgowlah.

I demand that all tunnels of over 5km in length are filtered, as there are no true safe levels of exposure to the pollutants emitted.

### **EIS Community Consultation Process**

I question the legitimacy of the EIS process as an appropriate method of community consultation.

The EIS documents are very lengthy and technical in nature, for ordinary people to consume and analyse in their spare time. This has been difficult to access for many in the community with limited technology available, particularly with no face-to-face sessions due to COVID-19 restrictions. Some of the documents are so long that a search for key words does not function properly.

Questions could be asked during the virtual sessions using the chat function, but many of my questions were not answered, and I was just referred to the FAQ page where again, my



questions were not answered. At the first session I attended, I asked if the Q&A would be available after the session and was told yes. Afterwards, I was disappointed to realise that only the video was available, and there were many answers I had wished to take a copy of.

In the second session I attended, I copied and pasted the Q&A chat so I could read them later. I analysed the full list and it showed only approximately 40% of questions receiving any response at all, with many of them just saying “Your question may be answered in the presentation” or just referring the person to a particular Chapter in the EIS documents.

This shows that the virtual session was not suitable for community consultation; TfNSW staff didn’t have enough time to provide any answers, and the community’s questions were left unanswered too.

Other options for consultation have been via phone or email. Staff answering the phone had limited information at hand and could not answer technical questions, but would pass the questions on to more appropriate staff to give feedback via email. The response time for email questions has been slow, with answers taking up to week, particularly in the later half of the consultation period. Email correspondence is also unsuitable for many questions from the community, as it lacks the to-and-fro conversation available via phone or in person.

TfNSW have stated that due to the volume of enquiries, some questions may not be able to be answered before the deadline for submissions – this is unacceptable; I received an answer to one of my questions via email at 5:02pm on Monday 1<sup>st</sup> March.

All these factors contribute to a community consultation and submission process that is not legitimately accessible and disenfranchises the community.

## **In conclusion**

The community cannot get back the time and effort they have spent in the planning and EIS process of the Beaches Link Tunnel. Nor can we reverse the mental trauma that a threat like this project imposes on ordinary people. I resent the fact that I have been called upon by neighbours and friends to assist, advise and console, when this should be the role of any government that proposes such a project.

The mental health impacts to the community cannot be understated – residents are either anxious and depressed now, or will become angry and depressed later when they realise the true impacts to their lives that have been glossed over by the planning process.

We all hope the DPIE can see sense, and judge this project on it’s merits alone.