

15<sup>th</sup> June 2021

**To:** Major Projects NSW

Project's responsible planner

Andrew Constance [office@constance.minister.nsw.gov.au](mailto:office@constance.minister.nsw.gov.au)

**Cc:** James Griffin [manly@parliament.nsw.gov.au](mailto:manly@parliament.nsw.gov.au)

Rob Stokes [pittwater@parliament.nsw.gov.au](mailto:pittwater@parliament.nsw.gov.au)

Zali Steggall: [zali.steggall.mp@aph.gov.au](mailto:zali.steggall.mp@aph.gov.au)

Dear Sir/Madam,

**Re: Objection to the Beaches Link Tunnel road**

I write as a concerned resident of North Balgowlah, to voice my objection to the proposed Beaches Link Tunnel and its impacts on our local pre-schools, primary school, our community and the local environment.

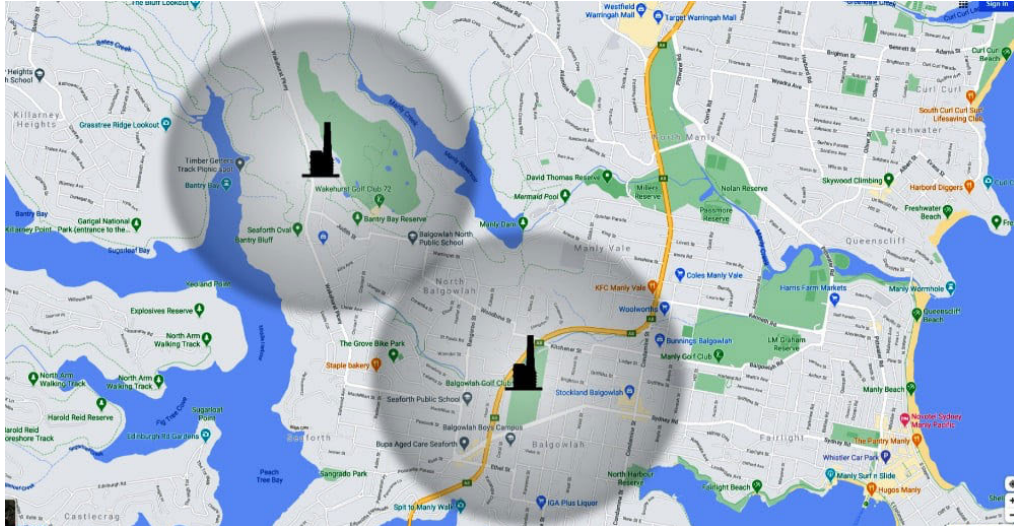
I have significant concerns that the impacts of the Tunnel will cause more negative impacts for every person in North Balgowlah than provide benefits and on review of the EIS those concerns are further heightened.

At a high level the following are my key concerns:

1. The Beaches Link Tunnel needs to be **assessed as a stand-alone project**, separate to the Western Harbour Tunnel. TfNSW have joined them together when it suited them, and we know the business case is better with cheaper build costs for the Western Harbour Tunnel. There is no logic to them needing to be built together.
2. The **business case**, cost-benefit analysis and the assumptions that go into them make up the critical information needed to know whether the project is a good idea. However, the government continues to hide this information, and not release it to the public. This information is released, they also need to be open about the amount of development and increase to the population on the Northern Beaches that comes with a tunnel.
3. The **environmental impact** will be devastating to many sensitive areas and has not received significant attention in the EIS process, or awareness in the wider community. Specifically I am worried about:

## a) Ventilation stacks

- Global health experts agree that pollution from traffic exhaust poses serious health risks. Emissions include nitrous oxides and particulate matter that, when breathed into the lungs, causes respiratory diseases such as asthma and emphysema, and cancer. There are several schools, preschools, childcare centres, and sporting fields within the vicinity of all the proposed ventilation stacks and from a parent's point of view, the increased level of pollution is unacceptable.



- Request: If the tunnel were to go ahead that the stacks be equipped with full filtration to minimize these impacts.
- At the very least the air pollution is kept at the current levels.
- In a world that is facing an environmental crisis, how could anyone live with themselves by approving a project which further degrades our air quality?

## b) Burnt Bridge Creek - Destruction

- The EIS states:
  - The EIS says of Burnt Bridge Creek: 'The freshwater creek runs for about four kilometres and is a vital ecological corridor of regenerated habitat that provides a range of important habitats for a diversity of local flora and fauna' EIS, Appendix O, page 45
  - 'Substantial base flow impacts at Burnt Bridge Creek are also expected during the operational phase with up to a 96 per cent reduction being modelled'. EIS, Appendix O, page xi.
  - 'This could impact ecosystems reliant on the water within these creeks' EIS Appendix N
- Specific, first-hand concerns which have been raised by myself and my neighbours are as follows:
  - Walking dogs, jogging, family bike riding from North Balgowlah to Manly, kids bike-riding, enjoyment of the trees and animals
  - There is so much bird life there, at least 4 types of parrots, this year there was two kookaburra families having babies, eels in the water

**c) Manly Dam reserve**

- Pollution resulting in the potential extinction of rare flora and fauna and the last remaining areas of Duffy's Forest, and meaning that one of the only swimmable dams in NSW is no longer safe for public use.
- Loss of recreational activities with the mountain bike trails that are used for riding, walking, and running.

**d) Clontarf and Middle Harbour (The Spit)**

- Movement of contaminated sediment potentially causing pollution of the neighbouring beaches.

**e) Queenscliff Lagoon & Beach**

- Discharge of 428,000 L per day of wastewater into Queenscliff Lagoon & Beach, resulting in health hazards for people and animals who swim in the waterways.
- Request: I want to know that my children, our future generations get to experience the natural wonders of the area in all its glory. That wildlife can live in the shadows of residential houses, not shadows of concrete, construction and pollution. **What is the point of making the northern beaches more accessible if the very heart of what makes the northern beaches so special is destroyed?**
- If there is anything that we can learn from the challenges of 2019 and reflect on what COVID can teach us - is that **we need to look after what we have got, each other and the environment so we can all live together sustainably, leaving the world in a better place for future generations.** The tunnel cannot be the answer.

**4. Construction Impact**

- The construction phase of the project will undoubtedly impact North Balgowlah residents with dust, noise, vibration, and heavy vehicle traffic in the area. North Balgowlah will have construction surrounding most of the suburb and the EIS indicates that during construction there will be:
  - Over 3,000 vehicles per day across all sites.
  - 1,690 vehicles per day at the Balgowlah Golf Course site alone.
  - 1.5 heavy vehicles every minute or 4.5 vehicles (total) every minute.
  - Over 4,000 homes subjected to excessive noise
  - Construction work to proceed 24/7 for up to 7 years.
- Request – Please alleviate the concerns of North Balgowlah residents by advising:
  - How the impact of trucks/vehicles will not be felt on the suburban streets that are already hard to navigate with local traffic and buses.
  - Commit to ensuring that areas around schools and parks are not impacted at all and are safe for families and children to walk or ride around the local community.
  - Advise how you will ensure that commuters from outside the local North Balgowlah area will not use our quiet suburban streets as a rat run to save time from congestion and money from using the toll roads.

Specifically, in relation to the Terms of Reference:

**(a) the adequacy of the business case for the project, including the cost benefits ratio  
(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts**

- There has been no business case and cost-benefit analysis performed for the Beaches Link as a stand-alone project, nor has anything been released publicly.
- The Western Harbour Tunnel and Beaches Link tunnels are separate projects and merits of each must be assessed separately.
- Experts in our community were driven to calculate our own cost-benefit analysis of the Beaches Link, and it showed a BCR of around 0.80 (using a discount rate of 7%).
- This is significantly less than the minimum of 1.20 that is needed to justify infrastructure projects.
- If the BCR is adjusted to take into account the impacts of COVID-19 and working from home (where 40% of current drivers work from home 3 days a week), the BCR falls to 0.60.
- The assumptions used to produce the traffic modelling used for business case must use the most-up-to-date data and be publicly released.
- The traffic demand data in the Beaches Link EIS used data from 2016 and does not take into account impacts from COVID-19 on travel patterns.
- It makes exaggerated claims of saving 38 minutes journey times on journeys that currently only take around 30 minutes at peak times.
- The assumptions on the increase to population on the Northern Beaches used for modelling must also be released publicly.
- The community deserves to know how much medium-high density development will be imposed in the community to justify the expense of building the Beaches Link Tunnel.

**(b) the adequacy of the consideration of alternative options**

- Alternative options have only considered road tunnels in different alignments.
- There is not adequate consideration of other transport options such as increased public transport, including business case and cost-benefit ratio for rail, tram, light rail, or bus options.
- The impact of more active transport such as bike paths and the uptake of e-bikes for either whole journeys or linking up with public transport.
- The impact of increased support for people's ability to work locally in de-centralised business hubs, working from regional areas or to work from home, instead of commuting to the CBD. Currently 52% of Northern Beaches residents work on the Northern Beaches, and this could be increased with more incentives to employers.
- The impact of increased support for companies to adopt more flexible work arrangements to minimise congestion during typical peak times.

**(c) the cost of the project, including the reasons for overruns**

- The cost per kilometre of the Beaches Link Tunnel is the most expensive of any road tunnel in NSW, due the to complex engineering involved.
- It also costs significantly more than a rail tunnel, despite a lower capacity to move people.
- With the complex engineering of the Beaches Link Tunnel, there is great risk for contractors to overrun their budgets, and they will need to include huge budget contingencies – all paid for by NSW taxpayers.

#### **(d) the consideration of the governance and structure of the project including the use of a 'development partner' model**

- The Beaches Link Tunnel is a "tunnel into a dead-end" unlike other toll-financed tunnels that take vehicles through or around parts of Sydney.
- The Beaches Link will not generate enough traffic for the project to be funded from tolls via the development partner model and will need a multi-billion dollar subsidy from the NSW government and taxpayers.

#### **(e) the extent to which the project is meeting the original goals of the project**

- The stated objectives to the projects are vague statements about reducing congestion and making faster journeys.
- There are no tangible, measurable goals or outcomes mentioned.
- The EIS travel time projections demonstrate that various intersections will suffer an increase in travel times (e.g. Warringah Rd, Military Rd, Warringah Freeway) due to the impact of the tunnels.
- This does not meet a goal of decreasing travel times for residents – a large percentage of journeys will have delays but no time saving elsewhere.
- The Beaches Link EIS assessed scenarios ("Do minimum", "Do something" and "Do something cumulative") but did not assess a scenario with the Western Harbour Tunnel, but no Beaches Link (despite the Western Harbour Tunnel being approved).
- This new scenario needs to be assessed to evaluate whether objectives are achieved without the Beaches Link.
- The general objective of improving transport on the Northern Beaches will not be achieved through building the Beaches Link Tunnel.
- The objectives can be more easily achieved through increased support for working from home, more flexible public transport within the Northern Beaches and an increase in peak time bus capacity.
- The Beaches Link Tunnel EIS shows traffic projections of significantly increased traffic volumes and longer journey times within the Northern Beaches.
- For example, we expect an extra 30,000+ vehicles on weekends during summer to come to the beaches – putting increased pressure on already insufficient parking and infrastructure.

#### **(f) the consultation methods and effectiveness, both with affected communities and stakeholders**

- Poor community consultation through the EIS process – conducted through a COVID-19 lockdown, with only virtual sessions, and without questions being answered appropriately.
- Formal applications from the community to extend the EIS consultation period due to COVID-19 restrictions were rejected as insufficient justification.
- Throughout the planning process, tunnel designs have changed unexpectedly, including moving the location of tunnel portal openings and exhaust stacks.
- A design in 2018 stated the tunnel was "further away from schools and homes... reducing the number of homes needing acquisition", but the subsequent design in 2019/2020 required many more homes to be acquired in Dudley St, and moved the tunnel closer to homes and schools.
- This has provided no certainty for residents, impacting our mental health.

## **(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio**

- The changes to travel and work patterns as a result of COVID-19 impacts have not been considered in business cases, cost-benefit analyses, or traffic projections.
- TfNSW have indicated that these effects are “temporary”, despite research and evidence showing significant permanent changes.

## **(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body**

- All planning details, assumptions, business cases and cost-benefit analyses must be released publicly to give the community confidence in the planning process.
- A business case and cost-benefit analysis must be carried out and publicly released for various transport options including public transport alternatives.
- All changes to designs and planning must be released publicly and undergo an appropriate EIS process.
- The number and scale of increases to dwellings and population on the Northern Beaches (particularly in Frenchs Forest) must be released publicly.
- The community must have transparency in order to evaluate any trade-off of an increase in population to justify increased road infrastructure.
- Transport Minister Andrew Constance has stated publicly that he wants to sign contracts for the construction of the Beaches Link project before the state election in 2023.
- This gives the community no faith in a transparent planning process to assess projects fairly on their merits – when the decision to build seems to have already been made by the Minister.
- Statements like this also place undue pressure on the Department of Planning, Industry and Environment (DPIE) to rush making its "determination" on the many complex and serious problems raised in the submissions to the EIS, including by DPIE themselves.

## **(j) the impact on the environment, including marine ecosystems**

- The impact on the local environment will be huge to our community with rare open green space permanently removed including over 2500 established trees without local biodiversity offsets.
- The EIS has stated tunnel construction in North Balgowlah and Seaforth will cause the water table in Seaforth and North Balgowlah to fall, and natural groundwater flows into Burnt Bridge Creek will fall by 96%.
- This much-loved creek will become a stormwater drain, running only after significant rain, with downstream impacts to Manly Lagoon.
- What will the loss of water flows do to large trees and wildlife near the creek?
- What will the fall in the water table and loss of groundwater do to all the large trees in the suburb, in residents gardens?
- The widening of Wakehurst Parkway from Seaforth to Warringah Road (on the ridge between Bantry Bay and the Manly Dam War Memorial Park) will create polluted run-off water from even moderate rain events during construction.
- The EIS states due to topographical constraints these cannot be controlled – an admission that many in the community find unacceptable.
- The community has many concerns about dredging Middle Harbour and stirring up toxic sediment that will impact the marine environment, and insufficient silt curtains are offered as the only protection during construction.

- Would you be concerned to swim at Clontarf and nearby? - The last mainland population of little penguins (approx. 60) lives on the Middle Harbour foreshore in Seaforth and Castlecrag, where coffer dams will be used in construction.
- The EIS acknowledges that the penguins will most probably be forced to leave the area permanently.

### **(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally**

- Based on the limited information TfNSW have told us so far, protections for residents and schools from noise, vibrations, dust and traffic are vague and inadequate.
- Residents in the areas around the tunnel portals will suffer increased pollution from the tunnel exhaust stacks, increased traffic and rat-running (and associated surface pollution), and extra noise and light.
- The 2018 Parliamentary Inquiry into the WestConnex Project found “That the various noise mitigation measures offered by Roads and Maritime Services are wholly inadequate to substantially reduce heavy construction noise.” (Finding 14).
- No tangible improvements to the process have been evidenced to give residents confidence if this project is built.
- During construction, it is up to residents to report if contractors are working outside of restrictions provided by the government (i.e. out-of-hours work, exceeding noise levels etc).
- Residents have no input into these “agreed” restrictions, but are expected to understand them and be the watchdog to protect themselves.
- Instead, we ask that a fully independent advocate or arbitrator be appointed to work on behalf of residents and the community to negotiate with contractors.

### **(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths**

- The impact on and loss of Balgowlah Golf Course - the impact on Clontarf Beach and park from disturbing polluted sediment in Middle Harbour - the impact on indigenous sites near Wakehurst Parkway, or at Clive Park and inadequacy of protections provided - the impact on Manly Dam War Memorial Park from construction run-off water

### **(m) any other related matter**

- We know that the Beaches Link Tunnel will contribute significantly to our greenhouse gas emissions both during construction and through the increased number of cars using it (even if many are electric vehicles).
- The EIS states yearly operational emissions of 45.3 kt in 2027, then rising each year to 52.5 kt in 2037, which equates to one single road contributing 0.04% of the emissions of the entire state of NSW.
- The project is not consistent with NSW greenhouse gas emissions reduction policy and Net Zero by 2050 goals to deal with climate change.

Regards

North Balgowlah Resident



### Our Family's Story:

Until March 2020 our family home was in Balgowlah <300m from the proposed site of the unfiltered ventilation stack servicing the Balgowlah portal at Nalgowlah Golf Course. I took time off work, unpaid in order to research the impacts of the project and get a solid understanding of what was being proposed regards building works, ventilation stacks, likelihood of resolving congestion and the like. I quickly realized induced traffic is a genuine concern and threatens the success of the project but more concerningly, the very real health concerns about pumping this many emissions over a community.

I connected with communities around Westconnex and Northconnex to understand what they were going through during the planning, construction and operation of the tunnels. After a few years, the prospect of having our neighbourhood decimated by the construction and operation of the tunnel and the negative impacts to our health due to air pollution and noise from trucks carrying away spoil from the tunnel, we realised we could not tolerate 6+ years of construction with the end result of a tunnel entrance and an exhaust stack within 200-400 meters away from our house, as well as increased and unmanaged surface road traffic around the area. Additionally our son should go to Bally Boys, potentially during the operational phase and would constantly be within range of the unfiltered emissions stack. The research we did with Sydney based air quality experts indicates very concerning data around acceptable, and more importantly unacceptable air quality standards, far below the accepted world norm. We decided to sell our home that we had envisaged living in for decades to avoid having to endure: the horrendous conditions other residents had been through during construction, the damage to homes and health, and the reduction in the value of our home. We now live in Manly, further away from the construction site to avoid the worst of the build and operation of the tunnel, but still close enough to be affected by poor surface traffic conditions, and the focusing of air pollution from 7km of tunnels, through the 4 unfiltered ventilation stacks and over the surrounding suburbs for a project that will not solve congestion. We will not benefit from this multi-billion dollar road project in any way. It will not improve our existing travel times into the city, and in years to come, through the well-documented understanding of induced demand, our travel times will become longer and the air around us will become dirtier and more dangerous to breathe. I am categorically against this project. I object.

### Other possible solutions:

#### - Improvements to Mass Transit

- o Increase the frequency and reach of bus routes so that people will actively choose to take public transport over getting in their own car, thereby reducing the number of private vehicles on the road and speeding up journey times. There is not even a dedicated bus lane which will be needed as we know people will be queued in a few short years.
- o Improving the integration of all public transport methods so that existing public transport options are optimised and journeys are quicker and more seamless.
- o Build new public transport in form of a rail line from Chatswood to Dee Why, which would remove a large cohort of current traffic flowing from Dee Why and further north from having to travel through the southern part of the Northern Beaches over Spit Bridge and through Mosman.
- o Reinstate the network of tramways that existed in Sydney until 1961 (see [https://en.wikipedia.org/wiki/Trams\\_in\\_Sydney#/media/File:Sydney\\_north\\_tram\\_map.png](https://en.wikipedia.org/wiki/Trams_in_Sydney#/media/File:Sydney_north_tram_map.png)), or extend upon the light rail so that it resembles the tram system that allowed people to travel from the Northern Beaches to the Sydney CBD. This would remove most private vehicles from the roads, speeding up journey times and reducing pollution.

#### - Improvements to Active Transport

- o Cycling and other active transport routes have grown and become more safe over the last few years. In tandem with improvements to public transport, the investment in a seamless,



frictionless network of active transport infrastructure from the northern beaches to the Sydney CBD or other satellite CBDs like Chatswood would improve our collective physical and mental health whilst saving money spent on future healthcare costs, and would remove motorized traffic from roads, meaning less pollution and quicker journeys for motorized public transport, service vehicles and road freight.

- Decentralise the current CBD hub to other areas by incentivizing businesses to relocate to other areas such as Macquarie Park, support these area with commuting options via public transport – don't make people go to the CBD to change like is currently happening as the buses are eroded.

My Submission in relation to the Terms of Reference:

(a) the adequacy of the business case for the project, including the cost benefits ratio, (h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts,

a. There has been no business case and cost-benefit analysis performed for the Beaches Link as a stand-alone project, nor has anything been released publicly. The Western Harbour Tunnel and Beaches Link tunnels are separate projects and merits of each must be assessed separately.

b. Experts in the local community were driven to calculate our own cost-benefit analysis of the Beaches Link, and it showed a BCR of around 0.80 (using a discount rate of 7%). This is significantly less than the minimum of 1.20 that is needed to justify infrastructure projects. If the BCR is adjusted to take into account the impacts of COVID-19 and working from home (where 40% of current drivers work from home 3 days a week), the BCR falls to 0.60. The project is unjustified.

c. All assumptions used to produce the traffic modelling used for business case must use the most-up-to-date data and be publicly released.

d. The traffic demand data in the Beaches Link EIS used data from 2016 and does not take into account impacts from COVID-19 on travel patterns. It makes exaggerated claims of saving 38 minutes' journey times on journeys that currently only take around 30 minutes at peak times. Are we to believe that the road tunnel will allow the public to travel back in time 8 minutes? The assumptions on the increase to population on the Northern Beaches used for modelling must also be released publicly. The community deserves to know how much medium-high density development will be imposed in the community to justify the expense of building the Beaches Link Tunnel.

(b) the adequacy of the consideration of alternative options,

a. Alternative options have only considered road tunnels in different alignments. This is unacceptable and seemingly only motivated to build a road tunnel at any cost despite its unsuitability.

b. There is not adequate consideration of other transport options such as increased public transport, including business case and cost-benefit ratio for rail, tram, light rail, or bus options.

c. The positive impact of more active transport such as bike paths and the uptake of e-bikes for either whole journeys or linking up with public transport. This would improve health outcomes in Sydney, by reducing motor vehicle pollution, and increasing the number of people engaging in physical exercise.

d. The impact of increased support for people's ability to work locally in de-centralised business hubs, working from regional areas or to work from home, instead of commuting to the CBD. Currently 52% of Northern Beaches residents work on the Northern Beaches, and this could be increased with more incentives to employers.-The impact of increased support for companies to adopt more flexible work arrangements to minimise congestion during typical peak times.

(c) the cost of the project, including the reasons for overruns,

a. The engineering of the tunnel is too complex, making it the most expensive road tunnel per kilometer in NSW. It can't move as many people as a train tunnel, and yet it costs far more. Due

to the complexity of the project it is foreseen that construction companies will list huge budget contingencies due to the project overrunning, all at a cost to taxpayers.

(d) the consideration of the governance and structure of the project including the use of a 'development partner' model,

a. The Beaches Link Tunnel is a "tunnel into a dead-end" unlike other toll-financed tunnels that take vehicles through or around parts of Sydney. The Beaches Link will not generate enough traffic for the project to be funded from tolls via the development partner model, and will need a multi-billion dollar subsidy from the NSW government and taxpayers.

(e) the extent to which the project is meeting the original goals of the project,

a. The stated objectives to the projects are vague statements about reducing congestion and making faster journeys. There are no tangible, measurable goals or outcomes mentioned. A multi-billion dollar taxpayer-funded road project that has no measurable benefits to the population should have been stopped in its tracks and cancelled long ago.

b. The EIS travel time projections demonstrate that various intersections will suffer an increase in travel times (e.g. Warringah Rd, Military Rd, Warringah Freeway) due to the impact of the tunnels. This does not meet a goal of decreasing travel times for residents – a large percentage of journeys will have delays but no time saving elsewhere.

c. The Beaches Link EIS assessed scenarios ("Do minimum", "Do something" and "Do something cumulative") but did not assess a scenario with the Western Harbour Tunnel, but no Beaches Link (despite the Western Harbour Tunnel being approved). This new scenario needs to be assessed to evaluate whether objectives are achieved without the Beaches Link.

d. The general objective of improving transport on the Northern Beaches will not be achieved through building the Beaches Link Tunnel. The objectives can be more easily achieved through increased support for working from home, more integrated public transport within the Northern Beaches and an increase in peak time bus capacity.

e. -The Beaches Link Tunnel EIS shows traffic projections of significantly increased traffic volumes and longer journey times within the Northern Beaches. For example, we expect an extra 30,000+ vehicles on weekends during summers to come to the beaches – putting increased pressure on already insufficient parking and infrastructure.

(f) the consultation methods and effectiveness, both with affected communities and stakeholders,

a. Poor community consultation through the EIS process, conducted through a COVID-19 lockdown, with only virtual sessions, and without questions being answered appropriately.

b. Formal applications from the community to extend the EIS consultation period due to COVID-19 restrictions were rejected as insufficient justification. Being prevented by law from moving around freely during a world pandemic seems to be a completely sufficient justification.

c. Throughout the planning process, tunnel designs have changed unexpectedly, including moving the location of tunnel portal openings and exhaust stacks. A design in 2018 stated the tunnel was "further away from schools and homes...reducing the number of homes needing acquisition", but the subsequent design in 2019/2020 required many more homes to be acquired in Dudley St, and moved the tunnel closer to homes and schools. This has provided no certainty for residents, personally impacting my mental health.

(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio,

a. The obvious temporary and permanent changes to travel and work patterns as a result of COVID-19 impacts have not been considered in business cases, cost-benefit analyses, or traffic projections. TfNSW have indicated that these effects are "temporary", despite research and evidence showing significant permanent changes. In my current role, I work from home permanently. In any future roles I take, I will ensure I work from home at least 3 days of my working week.

(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public-sector body,

a. A business case and cost-benefit analysis must be carried out and publicly released for various transport options including public transport alternatives to be assessed. All planning details, assumptions, business cases and cost-benefit analyses must be released publicly to give the community confidence in the planning process-

b. All changes to designs and planning must be released publicly and undergo an appropriate EIS process.

c. The number and scale of increases to dwellings and population on the Northern Beaches (particularly in Frenchs Forest) must be released publicly. The community must have transparency in order to evaluate any trade-off of an increase in population to justify increased road infrastructure.

d. Transport Minister Andrew Constance has stated publicly that he wants to sign contracts for the construction of the Beaches Link project before the state election in 2023. This gives the community no faith in a transparent planning process to assess projects fairly on their merits – when the decision to build seems to have already been made by the Minister. Statements like this also place undue pressure on the Department of Planning, Industry and Environment (DPIE) to rush making its "determination" on the many complex and serious problems raised in the submissions to the EIS, including by DPIE themselves.

(j) the impact on the environment, including marine ecosystems,

e. The negative impact on the local environment will be huge to our community. Open, publicly accessible green space will be permanently removed, and over 2500 established trees will be removed without local biodiversity offsets.

f. The EIS has stated tunnel construction in North Balgowlah and Seaforth will cause the water table in Seaforth and North Balgowlah to fall, and natural groundwater flows into Burnt Bridge Creek will fall by 96%. This creek will become a stormwater drain, running only after significant rain, with downstream impacts to Manly Lagoon, which ends very close to where I live and surf at Queenscliff (which is already horrendously polluted in heavy rain events and will ensure I spend less time in the water at this location). The creek will no longer be able to support the diverse wildlife that currently inhabits it.

g. The widening of Wakehurst Parkway from Seaforth to Warringah Road will create polluted run-off water from even moderate rain events during construction. The EIS states due to topographical constraints these cannot be controlled, this is unacceptable.

h. I have concerns about dredging Middle Harbour and stirring up toxic sediment that will impact the marine environment, and insufficient silt curtains are offered as the only protection during construction. I swim at Clontarf with my family during warmer months. Any swimming would need to stop, as soon as dredging begins due to the toxic pollution released. The wildlife that lives in this area have no such luxury, it will slowly die and become barren, much like the harbour beaches near the dredging.

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally,

i. You might want to include points such as:-How will you be impacted by construction? Based on the limited information TfNSW have told us so far, protections for residents and schools from noise, vibrations, dust and traffic are vague and inadequate.-How do you think you will be impacted when the tunnel opens? Residents in the areas around the tunnel portals will suffer increased pollution from the tunnel exhaust stacks, increased traffic and rat-running (and associated surface pollution), and extra noise and light. Do you already have health concerns that would become worse with this extra stress or pollution?-The 2018 Parliamentary Inquiry into the WestConnex Project found "That the various noise mitigation measures offered by Roads and Maritime Services are wholly inadequate to substantially reduce heavy construction

noise.”(Finding 14). No tangible improvements to the process have been evidenced to give residents confidence if this project is built. -During construction, it is up to residents to report if contractors are working outside of restrictions provided by the government (i.e. out-of-hours work, exceeding noise levels etc). Residents have no input into these “agreed” restrictions, but are expected to understand them and be the watchdog to protect themselves. Instead, we ask that a fully independent advocate or arbitrator be appointed to work on behalf of residents and the community to negotiate with contractors.

(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths

j. You might want to include points such as:-the impact on and loss of Balgowlah Golf Course-the impact on Clontarf Beach and park from disturbing polluted sediment in Middle Harbour - the impact on indigenous sites near Wakehurst Parkway, or at Clive Park and inadequacy of protections provided-the impact on Manly Dam War Memorial Park from construction run-off water

(m) any other related matter.

You can include any other points here that have not already been addressed.

The Beaches Link Tunnel will contribute significantly to our greenhouse gas emissions both during construction and through the increased number of cars using it, even if many are electric vehicles (although there is no expectation that electric vehicles will see such a significant uptake in Australia due to the sheer expense in buying one, and the fact there are very few electric vehicles available to buy due to Federal & State government policy making it less desirable for consumers to buy and car makers to ship to Australia. The project is not consistent with NSW greenhouse gas emissions reduction policy and Net Zero by 2050. To highlight this, the EIS states yearly operational emissions of 45.3 kt in 2027, then rising each year to 52.5 kt in 2037, which equates to one single road contributing 0.04% of the emissions of the entire state of NSW.

#### Other Important Points

- The Beaches Link Tunnel needs to be assessed as a stand-alone project, separate to the Western Harbour Tunnel. TfNSW have joined them together when it suited them, and we know the business case is better with cheaper build costs for the Western Harbour Tunnel. There is no logic to them needing to be built together.
- The business case, cost-benefit analysis and the assumptions that go into them make up the critical information needed to know whether the project is a good idea. However, the government continues to hide this information, and not release it to the public. This information is released, they also need to be open about the amount of development and increase to the population on the Northern Beaches that comes with a tunnel.
- The environmental impact will be devastating to many sensitive areas, and has not received significant attention in the EIS process, or awareness in the wider community. How you interact with our local parks and environment that will be impacted or lost is important.
- The EIS is not fit for consumption by the general public, and is purposefully too large to respond to in full. The general public is immediately at a disadvantage when trying to respond to this document effectively.

#### Links to sources of information for my submission

- Balgowlah Residents Group Website: <https://viabletransportsolutions.com.au>
- Of which I am an elected official (in the interests of transparency)
- Balgowlah Residents Group’s EIS submission: <https://viabletransportsolutions.com.au/wp-content/uploads/2021/04/Balgowlah-Residents-Group-Beaches-Link-EIS-Submission.pdf>
- The recent Beaches Link EIS produced by TfNSW: <https://caportal.com.au/rms/bl/documents#eisChapters>

- Submissions to the Beaches Link EIS from other individuals or groups, they are all published here: <https://www.planningportal.nsw.gov.au/major-projects/project/10456/submissions/12921/3251>
- Save Manly Dam Catchment Committee EIS submission <https://www.planningportal.nsw.gov.au/major-projects/submission/776481>
- Northern Beaches Council EIS Submission <https://www.planningportal.nsw.gov.au/major-projects/submission/783841>
- Willoughby Council EIS Submission <https://www.planningportal.nsw.gov.au/major-projects/submission/783836>
- Submissions to the Western Harbour Tunnel EIS from other individuals or groups: <https://www.planningportal.nsw.gov.au/major-projects/project/10451/submissions/12921/3251>

## SUBMISSION FOR THE NSW PARLIAMENTARY INQUIRY INTO THE IMPACT OF THE WHT AND BL

From Denise Gardner & Geof Thompson

Paris St Balgowlah 2093

16 June 2021

### INTRODUCTION

We are part of the Balgowlah community directly impacted by the proposed Beaches Link, in particular the location of the tunnel portal and stack and construction site on Balgowlah Golf Course.

As residents of Paris St Balgowlah since 1984 we have enjoyed the beautiful natural amenity of the local area. Along with close ties with my neighbours, it is the main reason we remain living here after so many years.

Our home is the second last house in a cul-de-sac which opens onto Balgowlah Golf Course. I have included a diagram at the end of our submission showing our location.

Our close community views the golf course as an extension of our street, an area for the children and dogs to play and the adults to socialize when not being used by the golfers. Since living here, we have used the golf course for exercise and play with our dogs. Our two golden retrievers currently enjoy walking and running daily on the golf course in the early morning and evening. My husband and I delight in seeing the local flora and fauna which carry over to our own property. We never tire of watching the nightly ritual of the local colony of endangered grey eared bats' flight path over the golf course, often swooping down to use the course dam as their daily water source, wetting their bodies then flying to a nearby tree to lick the water. I have also driven along Wakehurst Parkway to my work in the Forest for the past 35 years. The natural beauty of the area never fails to help my sense of wellbeing. I would be devastated to see these natural environments destroyed for ever for the sake of car travel.

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). We are intimately familiar with the area, having enjoyed the amenity of the golf course and creek corridor daily, whether playing golf, walking our dogs, 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. In a street of 15 households, the average residency is 42 years. Along with the golf course, the Burnt Bridge Creek riparian corridor offers essential habitat for the local wildlife and flora. Over the

years we have seen extensive wildlife including echidnas, turtles, eels, bandicoots, frogs and possums and had the privilege of watching fledgling kookaburras, power owls, tawny frogmouths, plovers, ducks, and lorikeets grow up. The extensively treed area offers habitat and breeding areas for numerous species.

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 have been involved with a local community action group formed following the BL project announcement, one of many groups. A huge amount of time has been put into the assessment and investigation of the project, seeking expert independent advice, educating, and informing the community through webinars, public meetings, and information leaflets. As a result of thorough investigation and consultation with industry experts we formed Viable Transport Solutions Inc. to highlight the project and create public awareness of the inadequacies of the project. Our website contains relevant information for your perusal.

#### [Home - Viable Transport Solutions](#)

In March 2020 we made the difficult decision to sell after 36 years, purely driven by our unwillingness to witness and live through the destruction and impact of this ill-conceived project at this stage of our life. We readied our home for sale then engaged a real estate agent who advised our home was valued at \$200000 less due to the Beaches Link project. Despite this making it impossible to buy within our local area and no compensation being offered we signed an agreement. Then the Covid-19 pandemic hit and days before we were going to market, we withdrew our property from sale. My husband is a general practitioner, and we envisaged a very stressful time which did eventuate. The impact of the pandemic was unknown at that stage. With the rollout of vaccinations his life is too stressful to contemplate moving at this stage.

#### (a) the adequacy of the business case for the project, including the cost benefits ratio,

There is no evidence of a Business Case or cost-benefit analysis being done by TfNSW to support the Beaches Link (BL) as a stand-alone project.

Chapter 3 of the EIS talks to “Need” but offers no financial model to support the proposal. While the WHT offers a second harbour crossing, the Beaches Link will service a relatively small number of NSW residents at huge expensive.

Community experts have calculated the cost-benefit to be around 0.80 which shows there is no justification for this expensive and invasive infrastructure project. Adjusting the BCR to account for the impact of Covid-19 and the subsequent increase in workers working from home (WFH)



or from local business hubs, the ratio is even lower. With the expected traffic disruption during the 7+ years of construction, the WFH culture will increase and likely become entrenched.

The merits of the Western Harbour Tunnel (WHT) should be considered separately as they are very different projects, unless the aim of the project is to increase the number of toll payers on Westconnex for the benefit of Transurban.

Offering business incentives for flexible working arrangements to minimize peak hour congestion would lessen the business case even further and offer a huge financial saving for the NSW government and taxpayers.

We request an independent review providing up to date traffic modelling and accurate traffic forecasts including transparency around projected population growth on the Northern Beaches is done. The claim that the BL will save drivers 38 minutes travel time is inaccurate. As a Northern Beaches resident for 37 years, I know this estimate is an exaggeration. Once this is done, I recommend an accurate cost benefit analysis is done and made public.

(b) the adequacy of the consideration of alternative options,

While Chapter 4 of the EIS looks at some alternatives there has been inadequate evaluation of alternative and viable transport options from the concept stage onwards. While other major cities around the world are increasing the emphasis on alternative modes of transport to the motor vehicle, this project perpetuates the use of motor vehicles without truly considering options such as rail from Dee Why to Chatswood (hubs). A new express bus route from Dee Why to Chatswood was announced last year but nothing has been forthcoming.

(c) the cost of the project, including the reasons for overruns,

<https://www.step.org.au/index.php/item/480-northern-beaches-tunnel-is-there-a-better-way>

Refers to an estimated cost of \$14 billion.

The cost per kilometre of the BL due to the complex engineering involved is staggering, making it the most expensive road tunnel in the state. Alternative transport options such as a rail tunnel move more people at a significantly lower cost.

Due to the complexity, it is anticipated contractors will overrun their budgets, significantly increasing the true cost of the project.

(d) the consideration of the governance and structure of the project including the use of a 'development partner' model,

The Beaches Link is a “dead end” tunnel, offering access to the relatively small population of Northern Beaches. While all toll-financed tunnels in NSW move vehicles through or around Sydney and generate adequate income for a development partner model (currently Transurban), it is unlikely the BL will generate enough use for a development partner model. Transurban have already indicated they are not willing to privately back the project and are only interested in toll collection. This will likely result in a multi-billion-dollar subsidy required by the NSW government and taxpayers.

(e) the extent to which the project is meeting the original goals of the project,

The premise of the project is based on population growth, “the population of Sydney is forecast to grow from six million to eight million over the next forty years” (EIS Executive Summary).

The metro area population of Sydney in 2020 was 4,926,000, a 1.38% increase from 2019. The metro area population of Sydney in 2019 was 4,859,000, a 1.4% increase from 2018. Is this a valid basis for the project?

The project is supposed to reduce congestion and decrease travel times, yet the EIS anticipates various intersections and corridors such as Warringah Rd, Military Rd, Warringah Freeway will suffer an increase in travel times due to the impact of the tunnels. The goal can be achieved more readily and cheaply through incentivizing work from home or local business hubs and improved public transport without the huge environmental and community cost.

A concerning outcome of the BL will be increased traffic flow into the Northern Beaches especially on summer weekends. The Northern Beaches already suffer from inadequate parking and infrastructure and the projected increase in traffic will further reduce the amenity of the area.

(f) the consultation methods and effectiveness, both with affected communities and stakeholders,

The EIS was released publicly just prior to Christmas 2020 when local schools and businesses shut down and many people went on annual leave effectively limiting the time to review the dauntingly massive document, consider and respond to it. At the same time the Northern beaches went into lockdown due to a Covid-19 outbreak which meant face-to-face community consultation sessions could not be held. The virtual sessions offered instead were a poor substitute for the purpose of an EIS review. It was difficult to ask questions and receive satisfactory responses. Despite requesting an extension to the submission date for responses to the EIS the closing date did not change. I also requested an independent assessment of the TfNSW performance through discussion with all stakeholders and community. This parliamentary inquiry offers some hope of independent assessment.

(g) the extent to which changes in population growth, work, and travel patterns due to the

Covid-19 pandemic have impacted on the original cost benefit ratio,

As discussed above, there is strong evidence that work travel patterns are changing permanently. Workers are unlikely to return to full time work in the office and will likely continue to split their time between the office and working from home. Business hubs are being set up to allow workers to work locally and work hours and thus travel times are more flexible, thus reducing the peak traffic flow.

The Balgowlah portal of the Beaches Link is located on the Burnt Bridge Creek deviation which continues south to become Spit Rd and Military Rd. I can see the traffic on the deviation from our nature strip and the reduction in peak hour traffic since Covid is evident.

As a key benefit of the tunnel is meant to be reduced travel times, the changed travel patterns make this less urgent than in 2016 when the work commenced.

(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts,

This is essential. The NSW Government must be transparent and publish accurate information regarding the business case and cost benefit ratio to inform the NSW community.

(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body,

The BL project is supposedly infrastructure for the benefit of the community. As such, the community must be consulted and involved in the process, with transparency in the business case, cost benefit analysis particularly for public transport options, planning and design. All changes to the project design and implementation must undergo community review and an appropriate EIS process. Plans for further development and population increase for the Northern Beaches must also be public knowledge, including the plan for Frenchs Forest which seems to be reliant on approval of the BL. It is difficult not to suspect there are hidden agendas behind the push for the Beaches Link.

Based on comments made publicly by Transport Minister Andrew Constance, approval is a foregone conclusion. It seems the BL project is an election promise aimed at maintaining the support of Northern Beaches Liberal voters. As Mr Constance has stated, he is determined to have the construction contracts signed before the state election in 2023. This infers the DPIE is also being pushed into rushing determinations on the many complex issues involved in the project.

(j) the impact on the environment, including marine ecosystems,

The Beaches Link will result in huge environmental destruction.

The loss of habitat through wanton destruction of mature trees and high value bushland is appalling and will have huge impacts on local microclimate and biodiversity. Thousands of established trees will be lost without local biodiversity offsets. 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.

The removal of the Balgowlah Golf Course dam will be an environmental disaster as 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.

The impact on the much-loved Burnt Bridge Creek riparian and wildlife corridor extending from Seaforth to Manly Lagoon and Manly Beach will be huge. 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.'

Over 12 hectares of valuable high-quality bushland including threatened Duffy's Forest and habitat will result from the widening of Wakehurst Parkway. Inadequate drainage will create polluted run-off water resulting 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. The EIS advised due to topographical constraints this cannot be prevented.

Damage will occur to Middle Harbour resulting from the Coffey Dams, dredging 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. The last remaining mainland population of 60 little penguins in this area will disappear and the endangered seahorse population will suffer irrevocably. There will be disastrous and unacceptable impacts on the local communities and recreational users around Clontarf, the Spit, Sandy Bay and Middle Harbour and must be reconsidered.

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally,

Despite living so close to the BL portal and construction site we were advised during community consultations that no compensation from the NSW government would be forthcoming. Nor have we been advised about who to contact with our concerns regarding the impact of construction and operation. The EIS contains complicated technical information regarding potential noise, vibration, traffic increase and visual impacts but nothing has been offered directly to the impacted residents to alleviate these issues. We believe the impacted residents must be consulted to discuss options to ameliorate these potential impacts such as double glazing and monitoring of the houses before, during and after construction for structural changes.

EIS Chapter 22 Urban design and Visual Amenity advises the impact on Paris St dwellings during construction (p 39) is assessed as high sensitivity with a moderate overall impact rating. There will be a moderate impact on the landscape character for Balgowlah Residential East (p 46). The largest visual impacts would be experienced by residents near the eastern boundary of Balgowlah Golf Course, due to the removal of vegetation and introduction of new built form within the golf course (p 57). The EIS advises the area currently has relatively low nighttime light emissions with very few light sources on Balgowlah Golf Course or the Burnt Bridge Creek Deviation road corridor. However, this will change with nighttime lighting during construction and lighting associated with the new portal once operational (p 57). Properties in Pickworth Ave and Paris St will have increased visibility of street lighting and vehicle headlights along the new access road, resulting in high to moderate nighttime visual impacts (p 58).

EIS Chapter 23 Hazards and Risk states during operation, potential hazards and risks to public safety, the surrounding community or environment may occur with


- Storage and handling of dangerous goods and hazardous substances (Section 23.3.1)
- Transport of dangerous goods and hazardous substances (Section 23.3.2)
- Traffic incidents on surface roads and within tunnels (Section 23.3.3)
- Atmospheric turbulence caused by discharges from the ventilation outlets and motorway facilities at Burnt Bridge Creek Deviation and the Wakehurst Parkway and the interface with aviation (Section 23.3.6).

EIS Chapters 8 to 13 further discuss impacts on air quality, health, etc. but I do must reign in my submission if it is ever to get finished!

(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths, and

The loss of Balgowlah Golf Course, the damage to Middle Harbour and Clontarf beach, the loss of habitat along Wakehurst Parkway and the impact on Manly Dam Memorial Park and Garigal National Park.

(m) any other related matter

 During the 7+ years of construction we will be directly impacted by the Balgowlah Golf Course construction support site and the Kitchener St construction support site. The permanent loss of the Balgowlah Golf Course (BGC), environmental destruction of Burnt Bridge Creek riparian corridor and loss of over hundreds of mature trees on BGC and the wildlife habitat they support will have an ongoing impact.

Once operational, we will be impacted by the portal to the 7km long unventilated tunnel, a new access road through BGC, a 30-metre-high unfiltered ventilation outlet and permanent motorway facilities, and a realignment and widening of the Burnt Bridge Creek Deviation. The beauty of the area and urban amenity will be lost forever.

If the project must proceed, we request TfNSW procures an independent and unbiased expert assessment to thoroughly assess the environmental and social impacts on Burnt Bridge Creek corridor, BGC, Wakehurst Parkway/Manly Dam and Middle Harbour and determine a design solution which does not result in the permanent degradation of these vital areas.

We believe with further analysis the Beaches Link will be revealed to be an expensive, destructive, and unnecessary infrastructure project which will only serve to increase the congestion on the Northern Beaches rather than solve traffic issues. Thorough evaluation of public transport solutions must be to determine viable traffic solutions.

If the Beaches Link proceeds, we strongly believe we must be offered financial compensation for hardship and the proven loss of property values. Noise and light mitigation options such as double glazing must also be offered.

## **Introduction**

My name is Hayley Hetherington and I have lived in the local area for 21 years. I have a son at Balgowlah Boys High School, which would be heavily impacted by the construction of the tunnel. I am strongly opposed to the construction of the Beaches Link Tunnel due to the predicted noise, air and water pollution, dust, loss of green space, threat to local endangered species and traffic safety concerns for children travelling to and from Balgowlah Boys High School. I would be happy to address the inquiry with my concerns.

## **How would the tunnel affect my family and our local public high school?**

I am deeply concerned about the impact to current and future Balgowlah Boys students and staff in relation to high levels of dust, noise and also in regard to pedestrian and cyclist safety for children travelling to and from the school. Many local children cycle and walk to Balgowlah Boys School and face the prospect of crossing road entrances opposite the school that are predicted to have hundreds of large trucks entering/leaving each day. Once the tunnel is complete, I am further concerned about the proposed ventilation stack, which will see a definite increase in levels of air toxins in a 1.2km radius. The long term effects of these air toxins is unknown and yet it has been decided that 'not enough people will suffer medically as a result of the toxins to justify the expenditure on filtration'. Why are we gambling with the health of our children whose schools fall within the 1.2km radius? Similar ventilation stacks in European countries are fitted with filtration systems. Why not here? I also wish for the Balgowlah Oval to be kept intact, including the trees surrounding it, and kept open for safe access to the Bally Boys community, who have so little outdoor green space to use. Finally, how will Balgowlah Boys School be able to run HSC or other high stakes exams on campus with the expected noise and vibration disruption? We should be supporting our local high schools – especially ones such as Balgowlah Boys which has excelled in recent years.

I have huge concerns for the potential damage to the Burnt Bridge Creek. It is not only a vital ecological corridor for local flora and fauna but a well-used recreational track for walkers, joggers cyclists and dog-walkers, including my family, who do all 4 of those activities along the path. It is predicted that there will be a 96% reduction in creek flow after the completion of the tunnel project. This will render the creek little more than a stormwater channel and will likely decimate the lizards, wading birds and cormorants that my family regularly see there. Additionally, what effect will this loss of flow have on the protected grey-headed flying fox colony? This species is crucial for our native forests due to their role as pollinators and seed dispersers. The path also provides a shady place to walk in the heat of summer. If the large trees lining the path cannot survive the loss of water, the loss of shade from the tree canopy would not make it a pleasant place to exercise in summer heat.

My family also use the Manly Dam Memorial park on a regular basis to bushwalk, mountain bike, run and swim. My husband regularly spots wallabies on early morning runs and on a guided night walk at the dam we saw two Powerful Owls. My concern is that the proposed widening of the Wakehurst Parkway would likely lead to polluted runoff after rain into the dam itself, thereby making pollution levels too high to swim. Also, the clearing of the dam's bushland to widen the road to 6 lanes would be a threat to the beautiful wildlife my family see there, the six lanes would



be visible and audible from further away (destroying one of the few areas to enjoy total peace and tranquillity) and would no doubt lead to much wildlife becoming roadkill.

I am also worried about the toxic sludge in Middle Harbour which will be disturbed during the construction process causing potential pollution throughout Middle Harbour, including the dog beach at Sandy Bay and the children's swimming area at Clontarf reserve, both heavily used recreational areas. Experts in this field have stated that no toxic sludge curtain has been proven to be 100% effective. It's an incredibly beautiful area and it would be devastating to so many if this wonderful recreational area became unusable.

### **Addressing the Terms of Reference**

- (a) the adequacy of the business case for the project, including the cost benefits ratio & (h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts**

I would like to see the Beaches Link Tunnel assessed on its own merits, as a standalone project rather than being 'lumped in' with the Western Harbour Tunnel. This information should then be released to the public. I would also like the most recent data to be used for traffic modelling for the business case. This would take into account the fact that since COVID, 40% of people who drive are now working from home 3 days a week. I also understand that modelling for the tunnel time savings and traffic reduction figures along Military Road were completed before the B-line buses were introduced. These buses are fast, frequent and well-used. More up-to-date modelling must take these into consideration.

- (b) the adequacy of the consideration of alternative options**

Why is there no provision for a bus lane in the tunnel? Modern and growing cities around the world are trying to remove cars from the road and are investing heavily in public transport. Why are we so married to our cars in this country? Where is the business case and cost-benefit ratio for alternatives such as rail, tram, light rail and/or bus options? These alternatives must be explored and the figures presented to the public.

- (c) the cost of the project, including the reasons for overruns**

Because of the complexity of engineering required in the Beaches Link Tunnel, it is estimated to be one of the most expensive road tunnels in NSW. The cost of a rail tunnel would be far lower and would have a much greater capacity to move people. Taxpayers do not want to be responsible when projects overrun and costs blow out.

- (d) the consideration of the governance and structure of the project including the use of a 'development partner' model**

No comment.

- (e) the extent to which the project is meeting the original goals of the project**

The project's stated objectives about making 'faster journeys' are vague and slightly bizarre with strange predictions for a 30 minute time saving on a journey from Balgowlah to the city, which currently takes me about 35 minutes by public transport. The EIS carried out travel projections showing that some areas will actually see an increase in travel times due to the tunnels. The influx of vehicles to the northern beaches in summer has been predicted to be an extra 30,000 cars per weekend. The parking and infrastructure on the Northern Beaches already appears stretched on busy summer weekends.

**(f) the consultation methods and effectiveness, both with affected communities and stakeholders**

I feel that community consultation on the project has been poor. The EIS process, which took place during COVID lockdowns, only allowed for virtual sessions. These were scheduled at a time difficult for families preparing dinner or travelling home from work. This also meant you had to address your questions virtually and they selected which ones were answered, leaving you with the feeling that you hadn't been 'heard'.

Moreover, the tunnel designs have at times changed unexpectedly. This has created a lack of trust and a feeling of stress for local residents who have little certainty about what may come.

**(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio**

The business cases, traffic projections and cost-benefit analyses were all made prior to COVID 19. The effects of COVID on our work and travel patterns must be assessed and taken into consideration.

**(h) See (a) and (h) together**

**(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body**

As mentioned previously, all planning details relating to the project must be released publicly rather than hidden away. This would give the local community confidence in the process. All transport options (including public transport) must be given the same consideration as the tunnel project. This must include a business case and cost-benefit analysis for each option and these must be made available to the public.

**(j) the impact on the environment, including marine ecosystems,**

My concerns are in regard to the proposed widening of the Wakehurst Parkway. I am not satisfied that the large-scale damage to bushland through tree/habitat removal and the run-off of polluted water into the dam can be compensated for through the 'biobanking' process. Some threatened species such as the Eastern Pygmy Possum and the Red Crowned Toadlet will likely be wiped out as they will not 'move house' to newly rehabilitated or acquired areas of bushland. The widened parkway will also be more visible and audible from a larger area.

I am also worried about the toxic sludge in Middle Harbour which will be disturbed during the construction process causing potential pollution throughout Middle Harbour, including the dog

beach at Sandy Bay and the children's swimming area at Clontarf reserve, both heavily used recreational areas. Experts in this field have stated that no toxic sludge curtain has been proven to be 100% effective. An article in the Sydney Morning Herald suggests that the toxic sludge in the harbour is carcinogenic. Details concerning the levels of carcinogens have been concealed from environmental experts by the NSW government. ('I'm outraged': Secrecy over plan to dig up Sydney Harbour's toxic sludge.' SMH March 19<sup>th</sup> 2020)

Please see my earlier comments in '**How would the tunnel affect my family and our local public high school?**' for my thoughts on the Burnt Bridge Creek and how it would be negatively impacted.

**(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally**

See earlier comments in '**How would the tunnel affect my family and our local public high school?**' for my concerns about noise and vibration effects. I feel the information provided to the public about noise and vibration mitigation has been vague and inadequate.

**(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths**

See earlier comments in '**How would the tunnel affect my family and our local public high school?**' for my concerns about Clontarf reserve and Middle Harbour, Manly Dam and the Wakehurst Parkway, and Balgowlah Oval.

**(m) any other related matter.**

The effect of a rise in greenhouse gas emissions both during construction and through an increased number of cars using the tunnel, means that the Beaches Link Tunnel will not be consistent with NSW greenhouse gas emissions reduction policy and Net Zero by 2050 goals.

It also put us at odds many other modern global cities which are implementing 'liveability' ideas and policies. Most of these advocate more public and active transport and fewer cars on the road.

Thank you.

17<sup>th</sup> June 2021

## **Submission to the Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link**

Dear Members of the Public Works Committee,

I would like to voice my concerns about the proposed Beaches Link Tunnel and the impacts on the North Balgowlah community and the local environment. I object to its construction given the information available and the destruction it will cause.

I have been a resident of North Balgowlah for 8 years, along with my husband and our two primary aged children. North Balgowlah has been a wonderful place to live. We are surrounded by bushland, harbour and ocean. We are lucky enough to have easy access to all these environments and I know many residents of North Balgowlah regularly bush walk, engage in water sports and water-based activities, and enjoy living surrounded by such beautiful landscapes.

In order to voice my concerns with regard to the proposed Beaches Link Tunnel I will respond individually to the Terms of Reference below.

I hope you will consider all of these points and the negative impacts this projects will have on our community and the environment.

I am happy to have my name published.

Regards,

Melissa Gooch

### ***(a) the adequacy of the business case for the project, including the cost benefits ratio***

- As yet, there has been no business case and cost benefit analysis performed for the Beaches Link as a stand-alone project, nor has anything been released publically.
- The traffic modelling used for a business case must be more recent than the 2016 data used in the Beaches Link EIS, which does not account for changes in travel patterns post-COVID. I for one, no longer travel into the city for work and my husband travels into the city much less regularly than he did pre-COVID, normally spending at least 2 days/week working at home. The 2016 'traffic volume trends' upon which this proposal is built on, does not reflect changed working habits.
- The EIS indicated only a minimal reduction in traffic on Military Road through Mosman. I am concerned that the disruption and use of public money to achieve this outcome is not cost effective.
- A further concern is the use of public money to build what will probably become a tolled road.
- A NSW Auditor-General report published on 17<sup>th</sup> June 2021 found that the NSW government has understated the true price of the WestConnex motorway by excluding more than \$4billion worth of construction costs. Budgeted at \$16.8 billion by the NSW government, the additional costs suggest the true price of WestConnex would be close to \$21 billion. The report stated "Government decisions to fund WestConnex related projects outside of WestConnex's \$16.812 billion reported budget have reduced transparency over costs and understate the full cost of WestConnex." Whilst these costs were not included in the overall price, they were required for

the WestConnex to achieve the objectives of the 2013 and 2015 business cases. The lack of transparency in the WestConnex project concerns me as I do not believe we are being informed of the true costs of the Beaches Link project and as a result gives me little confidence in any business case or cost-benefit analysis.

***(b) the adequacy of the consideration of alternative options,***

- There has been no explanation as to why investment in our public transport system would not be sufficient to overcome any current traffic congestion issues. A business case focused upon the encouragement of private car usage is outdated and not in line with global environmental policies. The NSW government is privatising public transport including bus services on the Northern Beaches. Figures from the NSW transport agency have shown the punctuality of buses in the inner west have worsened since a private operator replaced State Transit last year. The NSW Government appears to be discouraging the use of public transport and encouraging the use of private vehicles. There is not even a bus lane in the proposed Beaches Link tunnel.

A recent working paper (Congestion in highways when tolls and railroads matter: Evidence from European cities, Miquel-Àngel Garcia-López, Ilias Pasidis & Elisabet Viladecans-Marsal) by researchers from the University of Barcelona, using data from 545 European cities from 1985-2005, confirms that capacity expansion efforts over two decades led to more vehicle traffic, not less, and congestion was not relieved.

In 2001, researchers Cairns, Atkins and Goodwin published a paper (Disappearing Traffic? The story so far) reviewing 70 road space reallocation cases. The reallocation of space away from private vehicles caused people to adjust their behaviour in ways traffic models did not accurately predict. When lanes were reassigned from car traffic to higher-capacity modes (sidewalks, bike lanes, bus/rail lanes) traffic issues were less severe than expected, and traffic volumes were significantly reduced.

In March 2021, the C40 Cities Climate Leadership Group (comprising 97 cities and focusing on fighting climate change whilst increasing the health, wellbeing and economic opportunities of urban citizens) stated that in a world reeling from COVID-19, investing in public transport could create millions of jobs and cut transport emissions. Every \$1 invested in public transport could generate \$5 in economic returns whilst every \$1 billion invested could create 50,000 jobs the C40 report said.

In my opinion, we should focus on mass-transit systems rather than increasing road infrastructure.

***(c) the cost of the project, including the reasons for overruns,***

- As stated in response to point (a) there is a lack of transparency in how the NSW government cost these projects as demonstrated by significant extra expenses in the WestConnex project.
- The cost per kilometre of the Beaches Link Tunnel is the most expensive of any road tunnel in NSW, due to the complex engineering involved. It also costs significantly more than a rail tunnel, despite a lower capacity to move people.
- With the complex engineering of the Beaches Link Tunnel, there is great risk for contractors to overrun their budgets, and they will need to include huge budget contingencies – all paid for by NSW taxpayers.

***(e) the extent to which the project is meeting the original goals of the project,***

- There do not appear to be any tangible, measurable goals or outcomes. Travel time savings are based on pre-COVID data and as a result new assessments should be conducted given the number of people now working from home and not travelling into the city as regularly.

- The EIS indicates various junctions will experience an increase in travel times ((e.g. Warringah Rd, Military Rd, Warringah Freeway) which does not meet the goal of decreasing travel times for local residents.
- The general objective of improving transport on the Northern Beaches will not be achieved through building the Beaches Link Tunnel. The objectives can be more easily achieved through increased support for working from home, more flexible public transport within the Northern Beaches and an increase in peak time bus capacity.
- The Beaches Link Tunnel EIS shows traffic projections of significantly increased traffic volumes and longer journey times within the Northern Beaches. For example, we expect an extra 30,000+ vehicles on weekends during summer to come to the beaches – putting increased pressure on already insufficient parking and infrastructure.

***(f) the consultation methods and effectiveness, both with affected communities and stakeholders,***

- I feel the community consultation has been poor. North Balgowlah will be significantly impacted by the Beaches Link (both during construction and once operational), and yet our household has not been directly approached for our views and opinions. The community consultation sessions through the EIS process presented vague information and staff were unable to answer detailed questions. On more than one occasion, I was told ‘this plan will probably change’. There was a constantly moving target, with the community unsure of what the plan was and as a result, it made it difficult to respond. This level of uncertainty has certainly caused me some anxiety.
- Requests to extend the EIS consultation period, which given the EIS’s size and sometimes complex language were I believe to be reasonable requests, were rejected. I have some familiarity with documents such as these, and I still found it a difficult document to wade through, particularly given its length.

***(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio,***

- As mentioned in response to point (a), changed working and travel patterns have not been accounted for in the business case, cost-benefit analysis or traffic projections. TfNSW have indicated these effects are “temporary”, despite research and evidence showing there have been significant changes. This is reflective of my own household where trips into the city have reduced significantly.

***(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts,***

- See point made in response to (a) regarding a lack of transparency in current costings.

***(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body,***

- I do not trust that the project is transparent, and as a result, I do not believe the project should proceed prior to all costings and the full business case being released to the public for review and assessment. WestConnex for example, is over budget due to a lack of transparency but given that has been revealed once the project had commenced there were few consequences for the government.
- A business case and cost-benefit analysis should be conducted for all public transport options and released to the public.
- Transport Minister Andrew Constance has stated publicly that he wants to sign contracts for the construction of the Beaches Link project before the state election in 2023. This gives the community no faith in a transparent planning process to assess projects fairly on their merits – when the decision to build seems to have already been made by the Minister. Statements like this also place undue pressure on the Department of Planning, Industry and Environment (DPIE) to

rush making its "determination" on the many complex and serious problems raised in the submissions to the EIS, including by DPIE themselves.

***(j) the impact on the environment, including marine ecosystems,***

- The impact on the local environment will be significant and irreversible:

IMPACTS ON LAND:

- The loss of over 3000 trees, mainly along Wakehurst Parkway and Flat Rock which are both wildlife corridors. Burnt Bridge Creek and surrounds will be destroyed due to a possible 96% reduction in water flow. During COVID, this Creek was a lifeline for everyone in the area. Local residents walked, rode, scooted and skated along the Creek. We are extremely lucky to have such spectacular bushland and wildlife on our doorsteps in a city. To destroy this would be extremely damaging to the local environment and the well-being of local residents.
- The EIS details 23 threatened species that will be negatively impacted. Hundreds of other species will also lose their habitat, be cut off from bushland, or be driven away. The proposed project counteracts the principles of Ecologically Sustainable Development in the Protection of the Environment Administration Act 1991 (NSW) which declares that the conservation of biological diversity and ecological integrity should be of fundamental consideration (PEAA Act Part 3(2)(c)).

IMPACTS ON WATER:

- I have great concerns about the impacts on the harbour given "contamination has been reported in sediments present within Middle Harbour and west of Spit West Reserve. Contamination is likely to be associated with inputs from the surrounding urbanised catchments and general maritime use within the harbour. The sediments pose a high contamination risk to construction. " (EIS APP M, Page 93-94).
- Sludge in middle harbour contains PFAS chemicals and heavy metals. (A recent review from the U.S Centers for Disease Control and Prevention [CDC] outlines a host of health effects associated with PFAS exposure including cancer, liver damage, decreased fertility and increased risk of asthma and thyroid disease <https://www.propublica.org/article/suppressed-study-the-epa-underestimated-dangers-of-widespread-chemicals>) Tributyltin has also been detected (a chemical that cause female sea snails to develop male sex organs and become sterile)
- The 'silt curtains' do not go all the way to the seabed, allowing a risk of contamination to be released into Middle Harbour. This risks the safety of those using the harbour for recreational purposes. Silt dispersion modelling in relation to contaminated sediment has been done for a period of '1.2' weeks but this is less than the time required to remove contaminated sediment. The dredging program is forecast to be 37 weeks. The modelling should cover the time it will take to remove the contaminated sediment.
- The current EIS fails to consider the effects of toxins released into the water on the local environment of Sydney harbour.
- Given the Sydney Metro – Chatswood to Sydenham EIS stated that an immersed tube design was assessed and not selected due to the high contamination risks to Sydney harbour I am concerned that this contamination risk has been overlooked.
- The risk of contaminants moving down from the tip site as the capping is disturbed and pockets of leachate are released, has not been assessed in terms of risks to human health and yet the EIS acknowledges the risk of run off to surrounding waterways and



middle harbour. The EIS acknowledges the risk of workers encountering contamination but does not assess the potential of bushwalkers, sporting groups, sailing clubs etc coming into contact with contaminants.

- The discharge of 428,000 litres per day of wastewater into Queenscliff Lagoon & beach will be hazardous for people and animals swimming in these waterways.
  - There is also a very real threat to the last mainland population of little penguins (approx. 60) living on the Middle Harbour foreshore in Seaforth and Castlecrag, where coffer dams will be used in construction. The EIS acknowledges that the penguins will most probably be forced to leave the area permanently. I find it unacceptable that we would consider this a reasonable consequence of this project.
- I am concerned that the NSW government has failed to deliver conservation offsets in the past. For example, 15 years after the M7 opened to traffic the state government has not yet established a public reserve that was proposed as the major environmental offset for the motorway's construction. Both the auditor general and the review of the Environmental Protection and Biodiversity Conservation Act, led by Graeme Samuel, criticised Australia's offsets regime as opaque, poorly designed and managed and lacking in regulation.
  - I am also concerned that the risks to swimmers, bush walkers, sporting groups, sailing clubs etc has not been assessed. As a family we visit Clontarf beach at least once per week to swim. I will not be doing this if this project goes ahead for fear of why my family will be exposed to if swimming in the water.
  - We need a full and extensive biodiversity assessment of the areas to be destroyed in order to allow a true cost-benefit analysis. There has also been a lack of modelling and investigation into the impacts of the contamination on our waterways.

***(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally,***

- The construction phase of the project will undoubtedly impact North Balgowlah residents with dust, noise, vibration, and heavy vehicle traffic in the area. North Balgowlah will have construction surrounding most of the suburb and the EIS indicates that during construction there will be.
  - Over 3,000 vehicles per day across all sites.
  - 1,690 vehicles per day at the Balgowlah Golf Course site alone.
  - 1.5 heavy vehicles every minute or 4.5 vehicles (total) every minute.
  - Over 4,000 homes subjected to excessive noise
  - Construction work to proceed 24/7 for up to 7 years.
  - Exposure to contaminated dust (potential lead, hydrocarbons and asbestos contamination)

I am not satisfied with the information TfNSW has given us thus far in relation to how this project will truly impact our daily lives. The 2018 Parliamentary Inquiry into the WestConnex project found "the various noise mitigation measures offered by Roads and Maritime Services were wholly inadequate to substantially reduce heavy construction noise." (Finding 14). There is no evidence to suggest noise mitigation measures have been improved.

I also do not think that it is adequate for residents to "police" contractors working outside of restrictions. There should be an independent advocate or arbitrator appointed to work on behalf of the community.

There have been no guarantees of compensation for any damage to property caused by variations due to tunnelling.

- I have concerns that poor air quality resulting from the Beaches Link construction will have negative health implications for residents, schools and businesses located close to the ventilation

stacks. Even Andrew Constance, Transport Minister for NSW, has stated his desire to see the electrification of all cars in order to improve air quality. He told the Sydney Morning Herald that, "I am the first state minister in our history trying to drive the electrification of transport vehicles for the purpose of health." However, despite these air quality concerns that I share with the Transport Minister, research conducted by academics from the universities of Sydney and NSW, published in Public Health Research on 9<sup>th</sup> June 2021, found concerns over long-term public health impacts for major projects were often ignored or considered too late. Senior author Patrick Harris from the Centre for Health Equity, Research and Evaluation at UNSW said "These projects will cost billions of dollars of public money and have significant health impacts, yet the public interest is not at the forefront of decision-making." He said the 2018 parliamentary inquiry into WestConnex was too late to make any substantive difference to the project despite two-thirds of the submissions raising air quality and mental health concerns. He stated "Parliamentary inquiries not only come too late in the process, [but] they also lack teeth if the government blatantly refuses to implement their recommendations."

I feel like our voice has not been listened to and I hope this parliamentary inquiry is not too late.

***(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths, and***

- The impacts in our local area will be significant:
  - Clontarf Beach will be affected by pollution from tunnel construction. As a result I do not think it will be safe to swim at this harbour beach or others in area.
  - Manly Dam will be impacted from construction water run-off and result in us not being able to swim there,
  - Queenscliff beach will be affected by run-off
- We do not yet know what contaminants will be in the run-off, but these areas will become unsafe to use.

***(m) any other related matter.***

- I have great concerns about the location of stacks and the pollution we will experience as a consequence. Global health experts agree that pollution from traffic exhaust poses serious health risks. Emissions include nitrous oxides and particulate matter that, when breathed into the lungs, causes respiratory diseases such as asthma and emphysema, and cancer. There are several schools, preschools, childcare centres, and sporting fields within the vicinity of all the proposed ventilation stacks and from a parent's point of view, the increased level of pollution is unacceptable. Gladys Berejiklian called the filtration of stacks "ethically right in the interests of health" in relation to the Land Cove Tunnel and yet we are being told that unfiltered stacks are now acceptable. Berejiklian said "Members of Parliament should examine their conscience and consider how they would feel if their children or the children of loved ones were exposed to this level of fumes every day and they were part of a government that could have put in place measures to reduce the impact of the fumes". Given that Berejiklian is now Premier, she has the power to make the change from unfiltered to filtered stacks. In the UK in December 2020 a Coroner's Court found that air pollution 'Made a material contribution' to the death of a child living in London near a busy road. Why would we allow our children to be exposed to more pollution that is necessary when it has been recognised that elevated levels of pollution can have significant, even fatal outcomes.
- In addition to the impacts on physical health, I am extremely concerned about the impacts on mental health. To live through this level of construction will be unbearable for many people. These are our homes. We cannot 'escape' the noise, vibrations, dust, traffic congestion. We have to live with this 24/7.