

**Submission  
No 157**

**INQUIRY INTO IMPACT OF THE WESTERN HARBOUR  
TUNNEL AND BEACHES LINK**

**Name:** Mr Craig Baxter

**Date Received:** 14 June 2021

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## Submission to the Inquiry into the impact of the Western Harbour Tunnel and Beaches Link, June 14, 2021

**Craig Baxter, Seaforth.**

I am a professional now working almost exclusively from my Seaforth home and travelling into the city or eastern suburbs only for meetings. This has enabled me to strengthen my connection to our local area, including training and operating as a WIRES rescuer and expanding my knowledge of the immense diversity of flora and fauna that will be impacted by the Beaches Link Tunnel. I would like to respond to several of the Terms of Reference.

### **1. Terms of Reference (j) the impact on the environment, including marine ecosystems,**

As a registered WIRES rescuer and a long time north Seaforth resident I am familiar with the unique and irreplaceable bush environment that is at risk should this project go ahead, and the many creatures that rely on it. **Having studied the relevant sections of the EIS closely I do not see the mitigating measures needed that might reassure me.**

#### **Manly Dam/Wakehurst Parkway**

Unfortunately, we have far too much firsthand experience with the impact of major developments on wildlife in this area. The Northern Beaches Hospital development in Frenchs Forest forced wildlife onto roads and drove them further south into ever smaller areas of bush near Seaforth, leading to a significant (and ongoing) number of deaths at the intersection and along Wakehurst Parkway. Given the constraints of reduced habitat, car strikes are already regular occurrences. Personally, I have responded to multiple swamp wallabies killed over a single week on Wakehurst Parkway. The multiple fines meted out to contractors for breaches of environmental conditions during the NB Hospital roadworks, and for the more recent Mona Vale Rd upgrade, highlight the extremely high risk to fauna – and the failure of project managers to protect them as required.

The plan outlined in the EIS for fencing the Wakehurst Parkway site during construction of the tunnel portal and road widening is certain to fail. It is simply no possible to reduce and fragment habitat without reducing their sources of food and shelter to the extent they become chronically stressed. Stressed animals from Manly Dam are already killed on Burnt Bridge deviation having followed the wildlife corridor east. Many more stressed animals will be forced onto roads with a project of this size, given the direct loss some 2500 trees and surrounding shrubs and grasses. It is impossible to imagine how a project of this magnitude can be carried out without the large scale loss of wildlife, including numerous precious, threatened species – both during the many years of the construction phase and due to long term impacts of contamination on the Manly Dam water catchment, the fragmentation and loss of habitat and inadequate fauna crossings.

In particular, I would like to highlight the high risk of contaminated run off from the ridge both during construction and during the operation of the proposed wider road along Wakehurst Parkway. This has the potential to contaminate and degrade both Manly Dam itself and the entire catchment, with the loss of critically endangered species such as the climbing galaxias fish and the Rosenberg's goanna.

I would also like to raise the issue of lighting. If the new wide road is lit it will have a detrimental impact on insects, nocturnal and diurnal animals. Yet, if it is not lit, it will potentially be dangerous for motorists. Lights would also disrupt the use of the propose wildlife underpasses.

Wildlife underpasses: The wildlife underpass proposed in the EIS is inadequate to facilitate the safe movement of most species and, therefore, will fail to keep many animals safe and will not protect genetic diversity. Research shows underpasses put some animals at risk of predation. Larger animals, especially macropods, are reluctant to use dark tunnels. The community has long asked for a substantial wooded over pass to link Manly Dam Reserve with Garigal National Park, independent of the tunnel planning. This must be a minimum requirement should the project proceed.

### **Removal of 2,000 trees:**

The EIS provides chilling reading given that close to 2,000 trees will be removed near Manly Dam, including areas known to be rich in biodiversity and inhabited by endangered species. The mitigation measure proposed is to have pre checks and a wildlife officer on scene. This is not sufficient.

Should the trees be removed a much more sophisticated planning and monitoring program must be put in place, before and during removal. Prior to removal a cool burn should be carried out by Indigenous fire practitioners – as the smoke moves only as fast as the slowest creatures. This would encourage wildlife to move safely out of the zone before the arrival of heavy equipment. Beyond the felling area additional ‘hollows’ must be installed in advance to help accommodate the displaced wildlife and supplementary feeding should be considered beyond the construction zone. During the felling itself registered wildlife rescuers and a vet should be onsite, including at least one wildlife rescuer vaccinated to handle bats. Without such care, the felling of so many trees will not just be a massacre of invaluable flora but will also lead to the direct or indirect killing of many protected native birds and animals.

### **Burnt Bridge Creek**

The EIS reports that Burnt Bridge Creek will be subject to a 79% loss of base flow during construction and up to a 96% loss of base flow over the long term. Having sought advice from academics with expertise in this field, it is clear that the tunnel project will lead to the death of this entire water systems with unknown impacts on the affected catchments and the flora and fauna communities within them. These include a community of endangered grey-headed flying foxes that are protected under both state and Federal laws.

The impacts on Burnt Bridge Creek, the riparian zone and surrounding catchment will lead to massive negative impacts on ecosystem and large scale deaths of native species. This is not acceptable under any circumstances and is likely to be vigorously challenged by many members of the community.

### **In summary**

In information sessions for residents, Transport for NSW repeatedly trivialised the profound impacts of this project on unique and much loved conservations areas that should be protected for all citizens and all generations. At every step it brushed aside impacts – for instance claiming flying foxes are accustomed to noise or that Manly Dam’s amazing galaxias fish is pollution tolerant. The scientists informing the EIS well know that the project will impose much larger noise and contamination impacts on these and other species and they fully understand the damage caused by cumulative impacts. It is beyond irresponsible, and simply scientifically inaccurate, to ignore cumulative impacts on ecosystems.

**The EIS foreshadows the loss of invaluable and unique flora and fauna with only cursory and ineffective measures proposed to offset the devastating impacts of the construction and operation of the Beaches Link tunnel. There are many, many other negative community and environmental impacts. However, these will be raised by other individuals and groups.**

2. **Terms of Reference** (b) the adequacy of the consideration of alternative options

Residents of the northern beaches were not consulted on any alternative options despite widespread support for better public transport, and the demonstrated popularity of the introduction of the B-Line bus service. Residents are not unilaterally opposed to new infrastructure projects, nor to a tunnel. However, this particular six lane tunnel and its route will cause massive environmental damage and local disruption without clear evidence that it will reduce congestion.

As the Productivity Commission recently noted, the first choice should be seeking improvements without a massive and costly infrastructure project. It noted:

New roads can generate substantial benefits but also have downsides: they cost a lot and disrupt communities while being built. Physical constraints and increasing land values limit the extent Sydney's road network can be expanded and upgraded. For these reasons, recent major road projects in Sydney have involved **substantial and expensive tunneling. While building new roads can increase capacity, it frequently does not lead to sustained congestion alleviation.**

**RECOMMENDATION 8.4: ADDRESS CONGESTION BY IMPROVING USE OF EXISTING INFRASTRUCTURE**

As a first response, investigate a package of light-touch options to reduce congestion. This should include measures that promote good driving behaviour, encourage off-peak travel and make targeted investments at specific congestion pinch points. No later than three years following implementation comprehensively assess reductions in congestion and broader impacts on transport networks. Contingent on evaluation of the package of light-touch interventions conduct a Gate 1 strategic assessment for cordon charging in the Sydney CBD and other congestion hotspots. pg 25, Recommendations

<https://www.productivity.nsw.gov.au/sites/default/files/2021-06/Productivity%20Commission%20White%20Paper%202021%20-%20Detailed%20Recommendations.pdf>

The Northern Beaches in an ideal area in which to test this approach, given that 52% of the population already lives and works within the LGA. The pandemic has increased working from home rates right across the peninsula, and my experience with meetings is that they can be scheduled during the off peak period, during which existing roads are more than sufficient. Given the upgrade of Mona Vale road more residents are using this route instead of Spit Bridge providing further opportunities to remove pressure on the Spit pinch point. It is also clear to any resident that much of the local traffic congestions (am and pm) is generated by students being driven to schools in private vehicles – as there is a dramatic fall in congestion during school holidays. This provides an excellent opportunity to encourage a shift into school buses, especially as vaccination rates increase.

**I believe there are many other options that would not sacrifice some of Sydney's most precious natural environmental areas for a toll road, and that these should be publicly investigated in consultation with local communities.** I also believe much of the modelling on which the Beaches Link is based – and dates back to 2016 – is out of date and, therefore, is a risky basis from such a destructive project.