

Submission
No 328

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

Name: Name suppressed

Date Received: 18 June 2021

Partially
Confidential

My Story:

We lived in a house near Balgowlah golf course, 200 meters from the proposed tunnel ventilation stack that is to be position on the golf course. We immersed ourselves in official information around the project, became very knowledgeable on similar projects around the world and how they impacted traffic volumes and flow, and how they impacted the environment and the communities they were built in or near. We 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 realized 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. 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 9km of tunnels through the ventilation stacks and over the surrounding suburbs. 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 phenomena 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.

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.
- Improving the integration of all public transport methods so that existing public transport options are optimized and journeys are quicker and more seamless.
 - 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.
 - 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), 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
- 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.

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. If NSW 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>
- 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>