

**Submission
No 387**

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

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SUBMISSION FOR BEACHES LINK TUNNEL - PRU WAWN

Having been a commuter from Avalon to Mosman for over 20 years, my major concern about this project is that we need more public transport – not toll roads. The Tunnel will be increasing car dependency and is not a sustainable long-term solution. Instead it's a tragic waste of money for minimal community gain. This exorbitantly expensive tunnel project will reach capacity very quickly – within 5 years and the traffic congestion problems will resume. We must be smarter and develop solutions that remove cars from roads, while considering the impacts of the climate emergency we are facing - on all future planning.

This **project contradicts the state governments climate change goals** when considering it has committed to achieving net zero emissions by 2050. The benefits of meeting these goals are worth it - “CSIRO has estimated that achieving net-zero emissions before or soon after 2050 will deliver ‘higher economic growth’ than more moderate trends. NSW is committed to delivering strong economic growth, and supporting net-zero emissions is consistent with that commitment.” Northern Beaches Council has set strong targets around reducing car use in line with this policy. The EIS demonstrates that the reverse will be achieved and this project increases car dependence and trips. With \$14bn being allocated to a road option rather than a public mass transit option it is unlikely that there will be a significant mode shift to public transport in future. There is no dedicated bus lane in the tunnel - research shows that where public transport travels at the same or a slower speed as car traffic motorists will choose to drive. The project team have confirmed that the alignment of the proposed tunnel in the EIS cannot be converted to rail due to gradients.

The Dee Why to Chatswood corridor has been assessed as being the most viable route for a rail (train, metro or light rail) based alternative. The climate impact and sustainability of this project needs to be assessed and preferably the \$14 billion spent on a world class fast efficient public system, linking the northern beaches to Macquarie, Chatswood, the city and beyond. Traffic studies show that the bulk of traffic moves east west from Dee Why to Chatswood, from Mona Vale to Macquarie and rest is local.

Being such a complex build it will in all likelihood blow out to a 10 year building time frame - like North Connex in Melbourne which has blown out considerably.

Many have concerns about it not achieving the purpose of improved congestion, that it shifts it down the road to Manly Vale and Warringah Rd, with no plans to manage that situation post construction.

There are not even any comprehensive plans in place to manage traffic during the build, which will create massive delays for those living on the peninsula, who are even less likely to want to commute to the city. Especially considering the price looks like it will be increasing by 4% each year.

The environmental impacts will be significant. The proposed 4-6 lanes for the Wakehurst Parkway will inevitably destroy bush at the top of Manly Dam and Garigal National Park. The ridge is simply too narrow for such a wide road.

Road Tunnels have a high resource, waste and emission profile as they are larger than rail/metro tunnels. This Immersed Tube Design for the crossing of Middle Harbour increases environmental impacts, cutting through sensitive habitats, areas of variable foreshore geology and major Middle Harbour and Manly Dam catchments.

Particularly concerning is the large amount of waste material, which includes masses of vegetation and rock and fill being removed, 24/7 - as well as huge volumes of wastewater being flushed down Flat Rock Creek every day. The drawdown of water from the environment is a significant issue in catchments and foreshore environs - the project predicts more than 20Mtrs drawdown at Bicentennial Reserve, Flat Rock and Northbridge for example.

Noting further concerns about the drawdown impacts on Burnt Bridge Creek and the reduction in base and surface flows on its dependent ecosystems. The groundwater that may seep into the tunnel from Burnt Bridge Creek will need to be pumped to the North Shore for treatment instead. This will leave the Creek with significantly less water during dry spells. This major reduction in water flows over time will directly impact flora, fauna and downstream receiving waters, according to the Northern Beaches Council's submission.

Greater consideration needs to be made in the EIS regarding the **impact of loss of, or harm to, sea grasses and mangroves from increases in marine pollution**, plus the harm/destruction to trees and vegetation where there is a material change in groundwater level through drawdown. Mangroves are carbon capture powerhouses and any loss will have a significant impact on carbon exchange across the project's footprint. The loss of this major carbon capture ecosystem has not been accounted for in the planning stage and must be adequately assessed. Excavation of Middle Harbour sediment has the potential to release heavy metals, pesticides and tributyltin, a chemical used in cleaning boats, which has been banned since 2008 as it causes sex changes in marine organisms.

Government legislation is not met by the project because the principles of ecologically sustainable development are not being met. Ecologically sustainable development is defined under the *Protection of the Environment Administration Act 1991 (NSW)*

These definitions are not met by the project because endangered species will be put at risk as habitat

is degraded during construction and forever more, with the loss of creeks, trees and vegetation. The EIS acknowledges that animals and birds on the construction footprint and nearby bush reserves will be driven away, in some cases permanently, by loss of habitat, food and breeding sites and by the noise, lights, vibration and traffic.

The EIS offers very weak mitigation processes. This represents intergenerational theft as the conservation of biological diversity and ecological integrity will not occur with such devastation, compounded by a serious trending upward growth of transport emissions – further emanating from this car intensive tunnel project.

Apart from the negative environmental impacts which I object to very strongly, the planners need to take into account that Sydney's lower north shore is rich in Aboriginal heritage dating back 4500 years. The environmental impact statement for the Beaches Link Tunnel reveals that there are likely to be Aboriginal archaeological sites on the north shore which could readily be covered, submerged and destroyed by the project.

Even known aboriginal sites which are deemed to be at "negligible" risk from the project could be damaged or destroyed because the construction company chosen can alter tunnel locations, depths and dive sites even after consent has been given for the EIS.^[1]

The unique Aboriginal carvings along Engravings Trail will be under threat from road runoff, construction debris and possible blasting impacts. The landscape in which they are in will also be significantly degraded.

The Beaches Link Tunnel project is a state significant development - so state Aboriginal Heritage laws can and will be overridden. A disgraceful situation.

It appears that the purpose of the Beaches Link is to support the viability of West Connex because the business case doesn't stack up for West Connex either. Evidently the Tunnel project and the consultation process is being rushed for political reasons. Once this tunnel is built it will become a feature of this landscape and the opportunities to mitigate its impact and protect the precious environment of the local area will be lost.

The proposal must be rejected.