

**Submission
No 365**

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

Name: Mrs Ann Collins

Date Received: 17 June 2021

17th June 2021

The Hon. Daniel Mookhey MLC
Chair
Public Works Committee
NSW Legislative Council
Parliament House
Macquarie Street
SYDNEY NSW 2000

Public.Works@parliament.nsw.gov.au

<https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2767#tab-submissions>

Ann Collins - Submission to the Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link

Dear Members of the Public Works Committee,

Thank you for the opportunity to submit to an Inquiry regarding the impacts of these environmentally destructive projects. I strongly object to the Western Harbour Tunnel (including the Warringah Freeway Upgrade) and Beaches Link (including the Gore Hill extension) projects and urge you to recommend that the NSW Government abandon these plans immediately.

I am writing from the perspective of :

- 1. Concerned resident of Manly Vale** – who will be impacted by the increased traffic using rat runs, the construction chaos on Burnt Creek Bridge Bypass, the destruction of the Balgowlah Golf Course, the loss of the Burnt Bridge Creek and downstream waterway, the increased traffic on Condamine Street, etc.
- 2. Parent of a Balgowlah Boys High School student (BBHS)** – who will suffer the noise, dust and construction impacts for 5-8 years, will be unable to attend school functions easily, will be impacted by rat runs, will be impacted during exam periods, will be impacted by air quality issues, etc.
- 3. Office Bearer of Save Manly Dam Catchment Committee (SMDCC)** – who having fought hard to protect the integrity of the catchment will be constantly butting heads with TfNSW and their contractors as the promised water treatment processes fail and the catchment is impacted in some way. Having experienced the Manly Vale Public School development I am not looking forward to this much larger construction footprint.
- 4. Community Representative on Manly Warringah War Memorial State Park Advisory Committee. (MWWMSPAC)** – who will be forced to concede to State and Local Government concessions for a development that has significant impacts to the integrity of the Park.
- 5. A supporter of Public Transport and the implementation of the B-Line bus network** – who will continue to support the system despite the government's plan to sell this off and reduce services, rather than provide an increased level of infrastructure to support this successful venture. I will be lobbying for increased public transport considerations to address the future traffic issues and travel needs.

6. **An engaged community member** – who has tried to educate the community about the realistic and potential impacts of the Beaches Link Tunnel, who values the area we live in, who is particularly grateful for the foresight of people who acted to reserve and preserve the high-value bush and waterways, who values natural environment not simply because it is a place of recreation and renewal, but because we believe it has intrinsic value independent of short-sighted human demands.

7. **Parent of a tradie, a nurse and a year 11 student** – whose lives will be severely impacted for 5-10 years as they attempt to travel for work and study from Manly Vale.

I acknowledge that there is need for solutions to the many transport problems across the Northern Beaches, but I do not see the current Beaches Link proposal as being the solution. Policies and infrastructure that are innovative and paradigm-shifting are needed - not an expensive, unimaginative, 20th century solution to a 21st century problem.

I submitted a detailed submission to the EIS as to why I object to these projects. My reasons are further outlined in relation to the Committee's Terms of Reference.

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

Census journey to work data shows that 52.1% of Northern Beaches residents work in their own LGA. NBC data shows there are 265,468 people in NB LGA in 2016, projected to grow to 288,431 in 2036 representing an increase of approximately 22,963 people (8.7% growth or 0.4% annual growth). This level of growth, and lack of travel outside the area, does not appear to deserve \$14billion of the taxpayer's money being spent by the NSW Government.

The project only generates 1500 temporary jobs in construction. Offset against this are job losses in the Northern Beaches for businesses affected by road closures, loss of parking etc during construction.

The Beaches Link is designed to allow massive construction at Frenchs Forest and probably Brookvale-Dee Why. Frenchs Forest will be the only major development in Sydney without a railway. Its feasibility for anything other than a commuter village is doubtful.

The EIS for the Beaches Link Tunnel covers issues relating to a particular project – and has nothing to do with the economic benefits of the project, whether these economic benefits can be achieved and if these benefits can be balanced against the potential negative impacts on the environment and delicate ecosystems.

Could you please release the Business Case?

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

These massive arterial roads will destroy communities and irreparably damage some of the best inner urban bushland in Sydney – there must be alternatives.

I do not believe alternative options were adequately considered:

- Options which encourage or create public transport corridors were not considered;
- Options which work to change behaviour or work patterns were not considered;
- Cars seem to be the only consideration.

- It does not appear that a fresh look at the problem was taken – the tunnel follows the road plan from the 1960s.
- to avoid large amounts of environmental devastation the tunnel could be extended to the Frenchs Forest intersection;
- the take-up of public transport has been underestimated;
- the East-West bus link from Dee Why to Chatswood via Frenchs Forest has not been factored in;
- the fact that 52% of the NB population live and work in the NB was not factored in.
- What else could you do with \$14 billion? (Does NB deserve this over other areas which need State Govt funding?)
- Spend the \$14 billion plus on world class fast and efficient public transport linking the northern peninsular to the city, Chatswood and beyond. NSW governments have spent billions on massive road and tunnel toll roads in recent decades and yet congestion continues to plague us.
- Create an incredible network of top-notch cycle paths and incentivise electric bikes.
- What options allow for peak and off peak? We do not need the infrastructure for peak to dominate our environment forever.
- Why do we need a tunnel that caters for peak with 3 lanes both ways when the Sydney Harbour tunnel is only 2 lanes each way?

Public Transport

The WHT EIS does not assess the impact of the B-line buses on congestion on the Harbour Bridge and Military Road. Nor does it take account of the possible impact of a rapid and frequent public transport link between the identified growth area around Frenchs Forest and Chatswood when combined with the metro to the city to be completed in 2024. The metro will have an estimated Chatswood to Barangaroo trip time of 9 minutes (11 minutes to Martin Place) and a departure every 4 minutes.

The BLT EIS mentions the planned rapid bus service from Dee Why to Chatswood operating in conjunction with the new metro but blithely dismisses its potential impact with: *While these projects would contribute to reducing congestion... they would not be sufficient to resolve the existing road network capacity constraints between the lower North Shore and the Northern Beaches. This is due to the complexity of journey patterns and trip purposes within Greater Sydney and the dispersed nature of origin and destination points for an individual journey.*

No mention is made of Census journey to work data showing that 52.1% of Northern Beaches residents work in their own Local Government Area (LGA) and 65% of the remainder work in either the City of Sydney, North Sydney, Willoughby or Ryde LGAs. Given that the EIS refers to the Military Road/Spit Road and Warringah Road/Eastern Valley Way corridors generally operating over capacity during peak periods but not at other times, journey to work data becomes particularly relevant.

The BLT EIS shows that the Warringah Road corridor is both busier and more congested than the Spit/Military Road corridor while being less used by public transport, reinforcing the need to consider public transport alternatives utilising this corridor.

There is no question of capacity constraints with the BLT EIS stating that the metro will provide a capacity increase of 100,000 passengers an hour.

This is an extract from Dr Michelle Zeibots submission (no 497 p12) to the WestConnex 2018 Inquiry. At the time she was the Research Director at the UTS Transport Research Centre.

“4.1 Trunk route development in the northern sector of Sydney

In late 2017, my colleagues and I at the Institute for Sustainable Futures undertook investigations of what we could do at that time about the Western Sydney Harbour Tunnel and Beaches Link. (a full report was referenced but not available from the Inquiry website).

The primary outcome from that investigation was that the option of an extension to the metro rail system from Chatswood through to the Hospital Precinct, Mona Vale and Brookvale should be investigated. Our reasons for this are described and outline in the document attached, but could be summarised as:

- Strategic centre development in the north west and west of Sydney would be better supported by introducing direct rail access to a region that currently does not have any, but is clearly in need of high capacity, mass transit*
- Such a line would also serve people wanting to travel to the major centres of North Sydney and the Sydney Central Business District without having to negotiate the difficult terrain through Military Road*
- The difference this would make to road traffic congestion is likely to be far greater than a continuation of road building due to the ability to introduce fast and stable travel speeds to that sector of the network, thereby offering an opportunity to stabilise the variable speed network at a higher speed during peak periods.*

A key recommendation is that this be investigated as part of current investigations and preparations for any major transport development in that sector.

I would like to emphasise that such an option has significant implications for the development of Parramatta as a second CBD and so while such a project may not appear to help people in western Sydney, it does have implications for whether or not Parramatta would be able to successfully develop as a substantial business district by enabling the catchment area for its workforce to extend to critical parts of the metropolitan region. The ‘science’ around this aspect of urban passenger transport development is explained in more detail in the report.”

Lack of exits along route – missed opportunity

The tunnel passes along the Lower North Shore but there are no exits at Northbridge, Cremorne, Mosman and Balmoral.

This is a missed opportunity to improve transport needs for people travelling to these suburbs.

Lack of exits along route – the perverse incentive to over travel

The pricing of the Beaches Link will create an unusual and unnecessary traffic problem on weekends. It is expensive to travel to the Northern Beaches but free once there. This creates the incentive to travel as far as possible once in the Northern Beaches and this will lead to weekend traffic jams from Avalon to Palm Beach.

This traffic jam will be made up of people trying to get as much free driving as possible to mentally compensate for the high cost of getting to the Northern Beaches.

This problem could be alleviated if there were exits along the route, spreading the trouble of weekend traffic jams over a larger area and lowering the cost of simply getting out for a drive around town.

I have read and endorse submissions by Victor Petersen, Balgowlah Residents, Baringah Bush Residents, and Save Manly Dam Catchment Committee re alternatives.

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

I do not believe the full costs are known.

If this tunnel is built in an environmentally responsible way – it would be too expensive. What other important projects are being sacrificed in NSW if this tunnel is built?

Why would we need a 3 lane tunnel each way from Balgowlah when the Sydney Harbour Tunnel is only 2-lanes?

(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,

Traffic goals are unrealistic and misleading.

I have read and support Balgowlah Residents and Terry le Roux's submissions in this area.

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

I have participated in TfNSW's online Q&A sessions for Balgowlah and Frenchs Forest. I have been online and read significant amounts of the 12,000 pages of EIS – including appendices. I have participated in a session from TfNSW for the MWWMSPEC. I consider myself to be reasonably well read in what is being proposed as I have made a substantial effort to become so. I am astounded at the lack of general and real knowledge about the project in the local community.

I do not believe there has been a fair and reasonable process for communication with Northern Beaches Residents. There is a huge assumption that everyone has access to the internet and is competent in reading 12,000 pages of detailed information. No face to face scenarios have been provided and once again, the webinars assume technical competence and access. TfNSW have isolated and ignored large sections of the community – whether intentionally or not. The choice of the Christmas school holiday period as public consultation, which ended up being a lockdown for the Northern Beaches community, feels like a deliberately discriminatory process.

In addition to TfNSW actions, our own local free paper, The Manly Daily, has been moved online where people need to subscribe to the Daily Telegraph to be able to read it. Once again, the residents who religiously read their local paper 3 x times per week are now forced online or do not see it at all.

Many groups, individuals and organisations have approached their local member James Griffin, TfNSW, the Transport Minister, and the Planning Minister to show some compassion and grant extra time – however this has landed on deaf ears. Once again, the token community consultation process is maintained. NSW Government seems to be hastily pushing this development through.

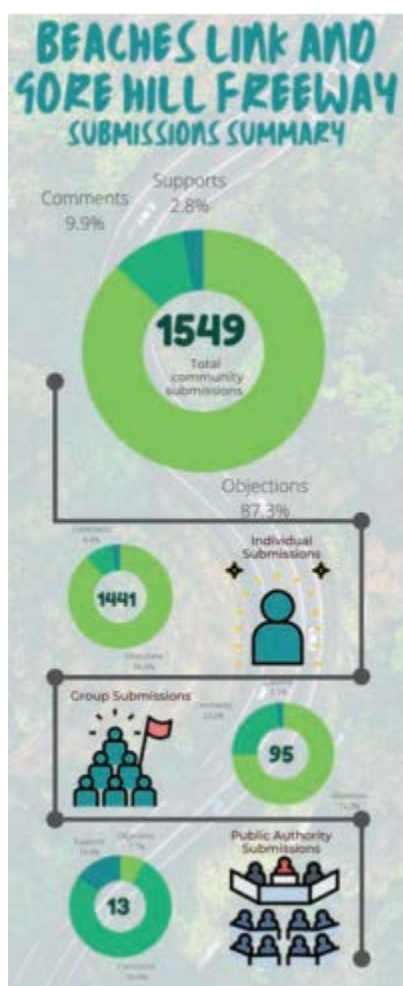
The information that has been provided is either, too high level and full of glossy motherhood statements and promises, or so detailed that you need to have a few University Degrees to be able to read through the detail to get the true picture. Despite this, many groups have found many failures within the EIS.

The current EIS and TfNSW processes were inadequate in light of the above and other shortcomings raised in this submission, and a revised EIS containing the additional information should be exhibited and a three-month period (not including the Christmas/ January period) allowed for public comment.

Misleading statements

The consultation documentation is full of misleading statements and opaque analysis.

Misleading statements have been made in the EISs and prior information documents regarding expected travel time savings from the projects. It is never made clear that projected time savings are not based on current travel times but rather on projections of a future if planned densification in areas such as French Forest and Mona Vale goes ahead.



Misleading statements have also been made in the EIS for the BLT (page 3.2) as to the impact of COVID-19 on future traffic volumes on relevant routes, by stating that traffic has returned to pre-COVID levels without considering the substantial but temporary decline in public transport patronage.

Artist impressions in consultation documents have been misleading by, amongst other things, understating the visual impact of ventilation stacks in the Balgowlah area, and understating the gradients along Flat Rock Drive which will have traffic lights installed near its lowest point to enable heavy vehicle access. Motorway facility sheds are shown in distant views and camouflaged green.

Historical analysis of previous land use has ignored potential sources of dangerous contaminants such as the Hallstrom refrigerator plant, despite it being mentioned in the historical study referred to in the EIS.

Intersection modelling has been made opaque by using performance bands, rather than time periods.

Poor Consultation however most people still oppose the BL & GHF – as per submissions summary.

87.3% Objections

9.9% Comments (most with major concerns)

2.8% Supports

What does it take for a project to be over-ruled?

If this was an election – they would be voted out!

(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,

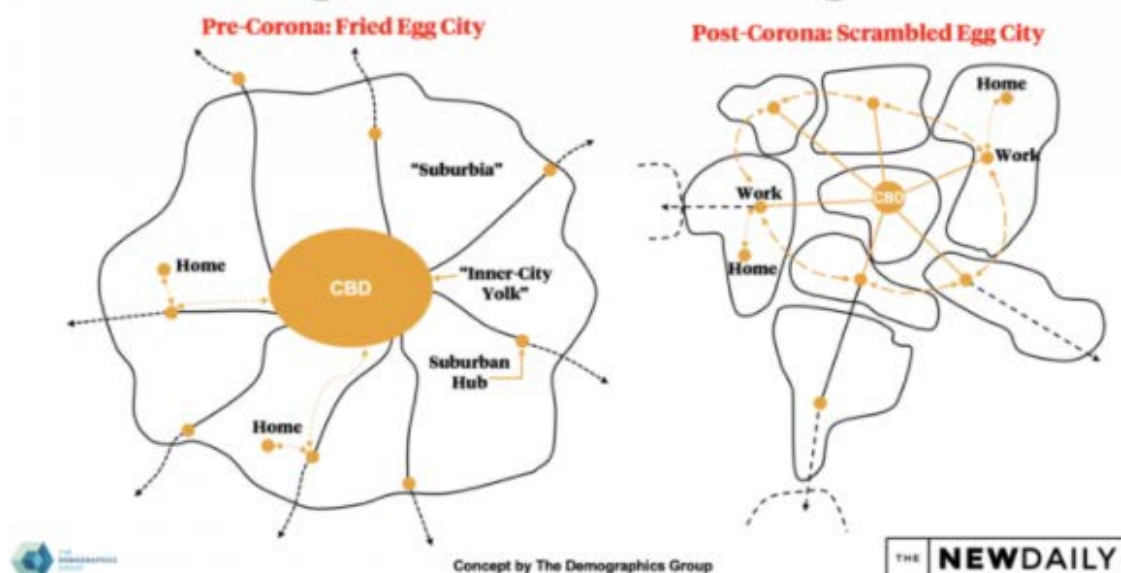
The EIS does not take into account the significant changes as a result of COVID-19 in 2020. The business world, education sector and community were able to “pivot” and make personal changes to adjust to the new scenario. These changes will have lasting effects on travelling to the CBD for work.

Comments such as those in Infrastructure Australia’s December 2020 report: “Infrastructure beyond Covid-19” - A 2020 Gartner CFO survey reports that 74% (CFOs) expect a shift whereby some employees remote work permanently, indicating significant uncertainty for CBDs following COVID-19¹.

Where in the EIS is this considered?

Please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

The working from home trend changed our cities



The Stats Guy: From ‘fried egg’ to ‘scrambled egg’, this is how COVID reshaped our cities - 6:00am, Jun 13, 2021

¹ Infrastructure beyond COVID-19, A national study on the impacts of the pandemic on Australia, 14 Dec 2020, p.49

https://thenewdaily.com.au/news/national/2021/06/13/working-from-home-cities/?utm_source=Adestra&utm_medium=email&utm_campaign=Sunday%20Best%20-%2020210613_eToro&fbclid=IwAR2BvdUiVKogrJE1avel-FfcNSwbyT-gnddJei9zIpgDsiUYEnKNSaaAbzc

“Then COVID came along and took a spatula to our fried egg city model. It stirred things up, scrambled things – and then scrambled a bit more.

Before the pandemic, under five per cent of people worked from home. Employers didn’t really trust their staff to work remotely. They preferred their people to be in the city centre near everything that a city had to offer. That was what they’d always done. It had worked for decades, so why change? Never mind what employees would prefer.

During the pandemic we suddenly worked home and found that it was pretty good. No, it was really good. We could pat the dog while on a zoom meeting, work in our tracksuits without brushing our hair and do a load of washing while waiting for that Amazon parcel. Employers had no choice. They were forced to trust their staff to work remotely. At the height of the lockdowns, around 40 to 50 per cent of the Australian workforce worked from home.”

See also:

23/3/2021 - Global PwC Survey of 32,000 workers confirms that 75% of workers want to continue to work from home in some form;

25/5/2021 - Australia Talks Survey published confirming a significant shift to permanent work from home and at least 43% continuing to work at least some hours from home.

There is a desire to continue hybrid working models which will significantly impact traffic volumes once public transport returns to normal - our public transport system remains hugely undersubscribed presently ie 30% down, trips which are no doubt awaiting vaccination roll out.<https://www.abc.net.au/.../work-from-home-here.../100161200>

(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,

No consideration of the B-Line implementation

Data in the EIS shows no consideration of the excellent take-up of the B-Line bus service. People are keen to use the public transport systems provided. Changes in 2020 due to Covid were unexpected, however the community, schools and business sectors all “pivoted” and changed behaviours to manage the different scenario.

What consideration of social change has been considered?

I requested that TfNSW please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

Little consideration of traffic in the Northern Beaches LGA.

The local infrastructure can’t handle the current population!

No detailed analysis in the EIS of the likely impact on traffic to and from the Northern Beaches LGA. Instead, there is reference to journey patterns in Greater Sydney: *While these projects would contribute to reducing congestion on the existing road network, they would not be sufficient to resolve the existing road network capacity constraints between the lower North Shore and the Northern Beaches. This is due to the complexity of journey patterns and trip purposes within Greater Sydney and the dispersed nature of*

origin and destination points for an individual journey.

Where are the detailed modelling and changes to the suburban streets to cope with the changed demands? We all have friends in Frenchs Forest who have just lived through years of disruption. What guarantees are there that this won't happen in Manly Vale, Balgowlah and Seaforth?

In addition, the tunnel portal empties at Manly Vale. Most afternoons and weekends, Condamine Street is already full. Where will all this new traffic go? More Public transport options should be available rather than creating and encouraging more traffic. The Balgowlah exit is poorly designed. Cars turn 180 degrees then go through two traffic lights to get onto Sydney Rd, then another set of lights to go past Burnt Bridge Creek Drive. It's setting up for traffic jams.

I requested that TfNSW please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

I have read and support the Northern Beaches Council's submission and the Balgowlah Resident's submission on these concerns. As a Manly vale resident and BBHS parent – the rat runs created in Balgowlah, Seaforth and Manly Vale will be crippling.

I object to TfNSW passing the local transport issues to the local Council to remediate and the expected issues with worker parking.

Traffic Demand is not properly measured and includes a tolling motivation

In the absence of viable public transport options, such a project is focused on increased car travel and thus any short term reduction in traffic congestion along Military Rd and similarly congested roads will soon be reversed. Thus, this project is ill conceived, short sighted, unethical and nonsensical. Perhaps check out the Utopia segment on induced traffic!

This project actually encourages car travel and further tolling in Sydney. Major cities around the world have all shown the negative effects of car congestion in their CBDs yet this project aims to increase car travel into Sydney's CBD with no matching parking provisions anywhere. This is irresponsible planning and not in Sydney's long term interests.

I disagree with this project as it uses public money to end up making a private Toll road and as such is not for the benefit of the wider community. The tolls will be too expensive for most and this will encourage rat-racing and more traffic on local roads. Thus the road/tunnel will never achieve its aim of reducing traffic.

Unlike public transport and creative government policy (e.g. encouraging WFH) a tunnel cannot be "adjusted" in response to changing circumstances. This tunnel is 3 lanes each way, when even the Sydney harbour tunnel is only 2 lanes each way. What demands are being planned for?

I requested that TfNSW please update the EIS and business case with renewed data and predictions for travel times and needs and release it for public scrutiny and response.

Lack of transparency:

Until recently no business case had been submitted to Infrastructure Australia with the result that the BLT in conjunction with the WHT were classified as an initiative rather

than a project. The WHT has now been evaluated by Infrastructure Australia with the Project Business Case Evaluation Summary, published in April 2021, showing a benefit to cost ratio of between 1.2 and 1.3. But this does not take into account the costs of the “dis-benefits” mentioned in the Infrastructure Australia summary, namely:

“Road use externalities, which include air pollution, greenhouse gas emissions, noise and water pollution, impacts on landscape, urban separation, and road damage” and “The reduction in consumer welfare from the charging of tolls on users of the Western Harbour Tunnel.”

The Infrastructure Australia summary also notes that “... cost estimates presented in the business case submitted by the proponent to Infrastructure Australia are from 2017”. They don’t take into account additional costs such as those which may arise from required remediation measures once comprehensive environmental and contamination assessments are completed.

Surely \$1.8 billion per kilometre can be better spent throughout NSW?

(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,

Lack of transparency:

Until recently no business case had been submitted to Infrastructure Australia with the result that the BLT in conjunction with the WHT were classified as an initiative rather than a project. The WHT has now been evaluated by Infrastructure Australia with the Project Business Case Evaluation Summary, published in April 2021, showing a benefit to cost ratio of between 1.2 and 1.3. But this does not take into account the costs of the “dis-benefits” mentioned in the Infrastructure Australia summary, namely:

“Road use externalities, which include air pollution, greenhouse gas emissions, noise and water pollution, impacts on landscape, urban separation, and road damage” and “The reduction in consumer welfare from the charging of tolls on users of the Western Harbour Tunnel.”

The Infrastructure Australia summary also notes that “... cost estimates presented in the business case submitted by the proponent to Infrastructure Australia are from 2017”. They don’t take into account additional costs such as those which may arise from required remediation measures once comprehensive environmental and contamination assessments are completed.

Surely \$1.8 billion per kilometre can be better spent throughout NSW?

Environmental Agreements broken for NB Hospital Road works:

Agreements were established with TfNSW regarding the management of road-kill, injured animals and fencing. Community liaison people were involved in assisting with this process. Each of these Environmental Agreements was unmet and fines were received for environmental damage and run off.

- Road-kill recording – instead of being handled by TfNSW or their delegates – it has fallen to volunteers.
- Injured animals – Volunteers have continued to be sent out for injured animals instead of agreed processes.
- Fauna Fencing was agreed to on Wakehurst Parkway North where Trefoil creek comes in. It has taken over 2 years to implement the fauna fencing which was supposed to be in place in advance of the construction.

How will this be managed for the BLT project? What guarantees are there?

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

Carbon neutrality by 2050?

NSW Government's commitment to carbon neutrality by 2050 (30 years away) may see great changes in the way we travel. The tunnel could be obsolete soon after finishing if the rest of the world stops producing cars.

There must be a requirement for this project to utilise the lowest emissions technology available during construction and for there to be an offset by carbon sequestration projects.

The New South Wales government must ensure that, throughout the construction process, methods and building materials and waste management are of the highest environmental standards.

Only proceed with a new tunnel plan if the environmental impact is minimal and the long-term economic viability can be supported using the best quality evidence.

Direct impact on Manly Warringah War Memorial State Park (Manly Dam)

Construction of the Beaches link project would involve the loss of 20.92 hectares of threatened species habitat, most of it along this stretch of road (That's 39 football fields). This includes the removal of nearly 1.5 hectares of Duffys Forest Endangered Ecological Community-*some of the rarest vegetation on the planet.*

The Wakehurst Parkway ridge is simply too narrow for such a wide road. Wakehurst Parkway cannot be widened to 4-6 lanes without destroying the bush at the top of Manly Dam and Garigal National Park. The edge of the road in many places will be either a steep cliff or artificial slope. It will be higher than the trees and visible throughout Manly Dam Reserve and surrounds, and in a lot of Garigal National Park. Edge effects will occur to reduce the quality of the natural bushland and remove habitat.

The road is too wide to have adequate runoff water treatment. Untreated water from the road will pour through the bush, scouring the land and filling streams below with sediment every time there is heavy rainfall. The proposed drainage processes from the EIS are inadequate. The swales suggested would have failed every month in 2020.

Any decrease in water quality in Manly Creek would have impacts on the population of *Galaxias brevipinnis* (climbing Galaxias) which complete their lifecycle entirely within the freshwater habitat above Manly Dam. This population represents the northernmost extent of the species and its loss would represent a range contraction. This species is susceptible to declines in water quality caused by increased sedimentation, contaminants and nutrients.

Street lighting along Wakehurst Parkway will significantly affect both nocturnal and diurnal animals, causing them to die out from that area. Eastern Pygmy Possums will be affected. Without street lighting, a 4-6 lane road with trucks, bicycles and pedestrians will be a safety hazard. If lights are not installed when the project starts, the accidents that follow will lead to street lighting.

Encouraging articulated trucks and construction vehicles to use Wakehurst Parkway could result in accidents and spills that will have significant environmental impacts on Manly Dam and Garigal National Park. A spill of toxic liquid will pour downhill directly

into the bush and be extremely difficult to clean and rectify.

There will be a lot of traffic on Wakehurst Parkway. Heavy construction vehicles going 80km/h will dominate the road for the next 30 years. Traffic noise will be heard all across the bush, particularly at night. Truck movements for the key construction site on Wakehurst Parkway will have about a truck per minute entering or leaving.

Construction will destroy a large area of bushland at the top of Wakehurst Golf Course around the two water tanks. This area was declared by Sydney Water to be rich in endangered plant and animal species and worthy of conservation. The potential runoff and sediment from this site is likely to be very damaging to Manly Dam – with the existing water treatment being planned to be used for runoff. There has already been a need for a propeller to be installed in Manly Dam to maintain the water quality following runoff incidents from the Golf Course. It is at a tipping point.

The Aboriginal carvings along Engravings Trail will be under threat from road runoff, construction debris and possible blasting impacts.

Any widening/re-alignment of Wakehurst Parkway should be to the west of the existing road. This would utilise heavily disturbed areas and reduce negative impacts on the higher quality Manly Warringah War Memorial Park bushland.

Improve the standard of roadway run-off retention and treatment along Wakehurst Parkway.

Recommended run-off management found in submissions by MWWMSPAC and NBC need to be the minimum standard (for example, use high efficiency sediment basins – HES). It is unacceptable to claim that the current proposed alignment makes it too hard to adequately control run-off impact. Change the alignment to make room, if necessary.

Runoff from Wakehurst Parkway will degrade bushland

Since the ridge is so narrow, it is not possible to build big enough swales to treat runoff from the road. See EIS, Appendix O Table 8-2. The swales that will be built can handle 38.8mm of rain over five days.

In 2020, this would have been exceeded 13 times or more than once a month.

In February 2020, design capacity was exceeded by over 7 times in a single five day period.

BOM rainfall statistics for 2020 (Terrey Hills except for February which uses Sydney due to lack of Terrey Hills data).

Month	Days	Total rainfall (mm)	Design capacity (mm)	Exceed design
Jan	17-21	98.0	38.8	253%
Feb	6-10	278.3	38.8	717%
Mar	4-8	92.4	38.8	238%
Mar	15-18	45.8	38.8	118%
Mar	26-30	73.8	38.8	190%

May	22-26	63.4	38.8	163%
Jul	11-15	40.8	38.8	105%
Jul	25-29	127.2	38.8	328%
Aug	8-11	41.4	38.8	107%
Oct	24-26	112.0	38.8	289%
Dec	14-16	46.0	38.8	119%
Dec	19-22	47.8	38.8	123%
Dec	29-31	113.6	38.8	293%

Analysing the data in Appendix O of the EIS, it can be seen that post-expansion, runoff from Wakehurst Parkway will be 3.5 times the current level. It will be concentrated into 18 swales. When the swales fail, water pours out and down the steep slopes of Manly Dam and Bantry Bay water catchment areas at high velocity, severely eroding soil throughout the receiving waterways and sensitive receiving environments. **When swales fail, the impact they have on the environment is worse than if they had not been built.**

The swales collect and channel water into powerful, earth scoring torrents. Swales are grass lined and only effective if the grass is alive. The grass will die in droughts, turning the swales into muddy stormwater channels when it rains, discharging even more solid waste into the environment.

The grass will introduce weeds into all the water courses throughout the area in Manly Dam catchment area and Garigal National Park.

The undersized swales mean that *“pollutants such as sediments, litter, nutrients, oils and greases, petrochemicals and heavy metals, which could potentially impact on water quality when discharged into receiving waterways and sensitive receiving environments”* will flow into Manly Creek, Manly Dam and Bantry Bay (EIS 17.5.3).

According to Appendix O 6.2.1.4 of the EIS:

“The project operational water quality design targets ... would not be achieved at the Wakehurst Parkway as this would require additional land acquisition, clearing of native vegetation and fencing requirements near publicly accessible areas. It would also require higher treatment efficiency controls such as biofiltration swales which would not be possible due to topographical constraints.”

In other words, it is not possible to build a wide road on the ridge which does not cause significant environmental destruction to the bush.

The wider the road, the wider the swales required to process the water, but such wide swales cannot be built without causing more bush destruction.

Recent ‘spin’ about electric cars filling the tunnel are just that.

Australia’s uptake of electric cars is miniscule and governments at every level have rebuffed calls for policy incentives or levers to drive their adoption. Instead, Australia’s highest selling vehicle, dual cab utes, are incentivised due to a FBT exemption, thereby driving up diesel and petrol emissions. **In the first quarter of 2021, diesel passenger car, SUV and LCV sector jumped 20.7 per cent** over the same period in 2020. The World Health Organisation classified diesel exhaust as carcinogenic in 2012. Similarly, increased congestion and vehicle movements during tunnel construction will expose local students, residents and workers to elevated levels of vehicle exhaust (primarily diesel) over many years.

The electric vehicle ‘furphy’ is further exposed when particulate pollution is investigated. Studies in the UK, where both new diesel and petrol vehicle sales will be banned by 2030, **show harmful particulate pollution from tyre and brake wear can be ‘1,000 times worse than vehicle exhaust’**, especially from larger SUVs and light commercial vehicles, such as those dominating Australia’s vehicle markets. This well documented risk was recently acknowledged by Planning Minister Stokes. On May 21, 2021 he was reported as saying:

“Mr Stokes said electric vehicles were heavy and “torque-y” and created a lot of wear and tear on roads. He also said the weight contributed to the amount of particulate matter they expelled. “Because EVs are so heavy, those particulates from brakes and tyres can actually be more significant than from existing petrol- and diesel-powered vehicles,” he said.”

This was later contradicted by the NSW Transport Minister Andrew Constance who says (SMH, June 21) *‘Transport Minister Andrew Constance says he’s determined to see the electrification of all cars, buses and trucks in NSW in order to improve air quality amid public health concerns over the government’s expanding motorway network.’* It is, however, unclear where Mr Constance’s optimism comes from.

In addition, a long term study of a mass die off of salmon in urban streams in Washington State found that storm water contaminated by microparticles from tyre wear contained toxic chemicals responsible for the fish deaths (<https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions>). Given the proximity of the Beaches Link tunnel’s stacks to the sensitive Manly Dam catchment and Burnt Bridge Creek – and the lack of containment for runoff from the proposed widened Wakehurst Parkway – we can expect increases in such toxic pollution in local waterways, potentially negatively impacting local ecosystems including multiple endangered species.

(<https://www.sciencedaily.com/releases/2020/12/201203144228.htm>)

Impact on Burnt Bridge Creek and Balgowlah Golf Course

Burnt Bridge Creek will effectively end as a naturally flowing creek. Water flowing down the creek will be drained (flow reduced 96%) and underground water pumped out to a depth of 11m. This is necessary to stop water dripping into the tunnel. The creek and

area around it will be dried out and incapable of supporting tall leafy trees and riparian bushland. This will impact the bat colony significantly.

The quick discharge of water into Manly Creek will increase sediment and send road runoff into the creek without the current filtering process, lowering water quality in Manly Creek and out to Queenscliff beach. Instead of a creek, we will have a cement stormwater drain. It will probably need a fence around it to prevent people falling in. Investigate and report on the impacts of the Balgowlah portal on the lower reaches of Burnt Bridge Creek, Manly Lagoon and Queenscliff Beach. This should be done for construction and operational phases of the project, particularly in view of the undergrounding of the creek and permanent reduction in stream flows (by 96 %!)

Impacts on Middle Harbour

- The tunnel will pass under Middle Harbour in what is effectively an underwater bridge. The bridge will be supported on four pylons. Building these pylons will take several years and displace mud, possibly laced with toxins from industrial activity, into the harbour.
 - The technology used to build the pylons is ancient. Modern technology would build the supports offsite and require only a few days to weeks to put in place, causing less impact on the environment, on traffic and the lives of people in the area.
- The potential environmental impact on marine life in the Middle Harbour area including the Spit, Clontarf, Beauty Point and Sailors Bay. The construction of two cofferdams and the laying of two immersed tunnel tubes are likely to pose significant risk by disturbing the highly sensitive ecological interaction of marine life. The disturbance of sediment and more turbidity will spread accumulated toxins and affect the seagrass and the microscopic organisms within which will threaten the survival of larger animals such as the White's seahorse, several fish species and consequently the **Little Penguins (Eudyptula Minor)**.
- Even though all the nesting is located within the protected bays of Manly, the penguins travel all over the harbour for foraging. Many sightings have been reported from the Middle Harbour areas as well as Northbridge, I am deeply concerned that all the disturbance through dredging the sea beds as well as construction side effect such as potential fuel leaks and under-water noise will kill the seagrass patches and with it the foraging opportunities of our last remaining Penguin Colony.

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

Recommend staggered implementation of Beaches Link Tunnel (BLT) portals, Gore Hill Freeway upgrade (GHF) and Western Harbour Tunnel (WHT) construction

The EIS section on Cumulative Impacts, does not appear to consider what the full impacts of simultaneous construction of Beaches Link Tunnel (BLT) portals, Gore Hill Freeway upgrade (GHF) and Western Harbour Tunnel (WHT) will be on the traffic in Sydney. We all know that when there is a breakdown on the Sydney Harbour Bridge, then we are impacted at the Spit Bridge.

The impact of simultaneous construction at both BLT portals, The Gore Hill Freeway and the WHT over the construction period will have disastrous consequences for the Northern Beaches traffic. In addition, by constructing both BLT portals which currently provide access to the Spit Bridge simultaneously, this will gridlock already congested traffic on both Wakehurst Parkway and Condamine Street.

I request consideration be given to consecutive (not simultaneous) construction of the WHT, GHF and BLT to lessen traffic congestion and accessibility impacts. This would also provide the ability to re-use existing resources and learn from other projects. The BLT portals should also be staggered development and not be built at the same time.

Use of blasting to speed up tunnelling?

The EIS and TfNSW forums indicated that blasting would be used to speed up the tunnelling process. However I note that this has been ruled out for sections of WestConnex.

Which parts of the tunnelling process in Balgowlah and Seaforth are similar to WestConnex and should be ruled out now for blasting?

<https://www.smh.com.au/national/nsw/blast-plans-dumped-for-final-stretch-of-westconnex-construction-20210217-p5739a.html>

The Beaches Link EIS said air pollution would diminish.

NOT SO according to the experts appointed by the NSW Chief Scientist.

Air quality experts say the traffic forecasts are dodgy, there's no evidence that air pollution will diminish, and the EIS cannot be believed.

That's my take on their findings -- you'll see we're right if you read their report here (note the final paragraph):

<https://committeefornorthsydney.org.au/docs/#ChiefScientist>

I have read and endorse the comments in Balgowlah Boys High School P&C submission regarding the impacts to the school community.

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

Manly Dam – Manly Warringah War Memorial State Park
Burnt Bridge Creek
Garigal National Park
Schools in the area including Balgowlah Boys High School
Flat Rock Gully
Middle Harbour & Penguin habitat.
Bantry Bay
The Coal Loader
Etc.

(m) any other related matter.

I support the 5 areas raised by Zali Steggall to Parliament on 24/2/2021²

https://www.zalisteggall.com.au/zali_steggall_mp_speaks_on_the_western_harbour_tunnel_and_beaches_link

"I wish to raise five central issues. First, there is the EIS process itself and the limited time for submissions. Consultation on a project of this size and significance must be done in good faith. It must be thorough and not rushed."

Second, great concerns have been raised about the impact during construction on the environment and the community, particularly in the sensitive ecological areas of Manly dam and the Garigal National Park, and the impact on local waterways, such as Burnt Bridge Creek and Middle Harbour. **These need to be addressed.**

The third area is the long-term environmental impacts of the project, particularly with regard to the placement of exhaust stacks and their lack of filtration. The New South Wales government's intention to pump unfiltered exhaust pollution into the atmosphere is, I would argue, reminiscent of old policies of pumping sewage into the ocean. **We have demanded clean oceans; we must demand clean air.**

The fourth area of concern is **ensuring this significant infrastructure project is future proof and prioritises public transport solutions.**

Finally, the New South Wales Liberal government is committed to net zero emissions by 2050, so, accordingly, there must be a requirement for this project to utilise the lowest emissions technology available during construction and for there to be an offset by carbon sequestration projects. **The New South Wales government must ensure that, throughout the construction process, methods and building materials and waste management are of the highest environmental standards.** The information to date falls short of this. I have written to the minister and am awaiting a reply. We must get this right.”

New “Design and Place” State Environmental Planning Policy

The government has recently declared an 'open space' initiative/policy in which it seeks to protect precious open green spaces. This project is not in alignment with this policy as this project will result in bulldozing at Seaforth and Flat Rock Gully to make way for dive site and truck turning circle, plus destruction of various golf courses e.g. Cammeray and Balgowlah.

Elizabeth Farrelly points out some sad truths in this article on Saturday 27th February 2021.

<https://www.smh.com.au/politics/nsw/are-you-stoked-by-nsw-planning-vision-don-t-be-beneath-its-friendly-cloak-lurks-jack-the-ripper-20210226-p5762f.html> SMH

27/2/2021 Elizabeth Farrelly

“Design-led? Stokes has been Planning Minister (or assistant planning minister) for five of the past seven years. If he had any genuine interest in beauty, environmentalism, consultation or connection to country we’d be seeing it by now. Instead, we have a city scarred by 10-lane motorways through parks and neighbourhoods, by endless toxic tunnels where signs warn not to breathe the air, by relentless metastases of 40-storey tower blocks jammed on every site a developer has been able to grab. We have public housing being rampantly redeveloped as private, sweet little train stations suddenly replaced by five-storey behemoths, bureaucrats sacked for refusing to fell thousands of highway trees, sprawl around virtually every country town, new coalmines approved apace and farmers forced to defend their land from huge mining corporates. Stokes’ reign is one of the most destructive the state has seen.

Meanwhile, Stokes’ accelerated rezonings, fast-tracked approvals, land-clearing and expanded complying development – all on a pretext of COVID-19 – continue apace. Consultation? Not likely.

Stokes himself may be either sincere but ineffectual, or insincere and disguising destruction. Weak or cynical. You choose. Regardless, one planning law is immutable. Words are cheap. By their deeds shall ye know them.”

Offset impacts/promises

Where biodiversity offsets are proposed, we have no confidence these will limit net losses to our precious environment.

We are also painfully aware that offsets have no effect locally, so cannot make up, for example, for the felling of one of the last patches of endangered Duffy Forest, now one of the rarest forest ecosystems on the planet. Likewise, the removal of habitat supporting our local endangered fauna species means they will simply die in situ, they will not be moved elsewhere.

We have already witnessed the ineffectiveness of replanting around the Northern Beaches Hospital and other development sites where numerous trees have died. A recent investigation revealed the NSW government has failed to deliver conservation offsets for large areas of bush cleared in Sydney's west for housing and toll road developments over two decades, including the M7 offset at Colebee Reserve that remains an 'ecological wasteland'.

<https://www.theguardian.com/environment/2021/feb/10/its-an-ecological-wasteland-offsets-for-sydney-tollway-were-promised-but-never-delivered>

In conclusion I object to the inadequate contents of the EIS and to the Beaches Link Tunnel project going ahead on several counts.

The EIS is out of date. Sufficient data has not been considered with the significant social changes over the last Covid impacted year.

The Business Case doesn't appear to stack up, the project is too expensive and the benefits are unsubstantiated.

Public Transport options have not been suitably considered. Alternative options do not appear to have been adequately addressed.

The environmental damage is too high for Sydney's precious natural habitat and waterways as compared to the benefits proposed (not even guaranteed.).

Next Steps:

My understanding is that as part of a process set out in the EP&A Act 1979, the DPIE now reviews the submissions to the EIS and is able to challenge the claims and assumptions of TfNSW in its description of how the project will be built and its claims on the environmental risks.

I requested that the DPIE fully considers the needs of the Northern Beaches (less than 270,000 residents) for transport infrastructure against the significant needs of the whole of NSW.

I requested that the DPIE revisit the Business Case for the BLT/GHF project with an open mind and reconsider the opportunities that \$14 billion could bring with public transport solutions and a 21st Century approach to carbon emissions.

I am happy to have my name published and would be willing to be called as a witness.

Yours Sincerely,

Ann Collins