

Submission
No 466

INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

Organisation: STEP Inc
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STEP Inc

Community-based Environmental Conservation since 1978

18 June 2021

Public Works Committee
Legislative Council of NSW
Parliament House
6 Macquarie St
SYDNEY NSW 2000

Dear Committee

Inquiry into the impact of the Western Harbour Tunnel and Beaches Link

STEP Inc is a local community-based environmental group, with a membership of over 500 in the Hornsby/Ku-ring-gai area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensuring proper management of this bushland including ensuring its role as habitat for animal species. Our group has considerable experience in environmental issues and regenerating and preserving natural bushland and native vegetation.

Thank you for the opportunity to submit to an inquiry regarding these major tunnel projects. We strongly object to these projects because they will be hugely wasteful financially and will not achieve the objectives of improving transport through northern Sydney and the Northern Beaches.

We comment below on some of the terms of reference of the Public Works Committee's inquiry relating to the Beaches Tunnels.

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

The project involves a massive expenditure of taxpayers money and will not provide sufficient financial benefits to justify its expense. The projections in the EIS of reductions in traffic congestion are selective and have a limited timeframe. Military Road, for example is not expected to experience reduced congestion. A more comprehensive analysis is required.

The impacts on local roads and roads near the tunnel access points, such as Warringah Road and Condamine St are not adequately analysed and are unacceptable.

What will happen to the additional traffic that will emerge at the northern end of the Wakehurst Parkway near the Northern Beaches Hospital? The continuation of this road alongside Narrabeen Lagoon is busy already and floods frequently. More frequent heavy rainfall associated with climate change will exacerbate this issue. Widening along this road is not an option in this environmentally sensitive area.

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

We oppose strongly the current proposal for construction of the Beaches Link Tunnels and the associated supporting works. The development of public transport facilities will provide better long-term infrastructure provision to cater for anticipated population growth and traffic congestion problems. It is hugely disappointing that the NSW Government has been so short-sighted in not considering alternative public transport improvements such as express buses services from Dee Why to Chatswood or metro type train services that can move people much more efficiently than private cars. The use of a dedicated express bus lane in the tunnels is not considered.

The government has a policy of reducing greenhouse gas emissions to zero by 2050 and yet this project will be increasing car use as against public transport that will reduce emissions. The actual construction will also have a huge environmental footprint with massive truck movements, use of machinery, waste generation and manufacture of concrete.

The planning of the Project has been rushed. The Metro Project could make a major difference to people movements with commuters travelling to the North Shore Line, provided that bush services are upgraded, and then catching the Metro to travel to inner Sydney and other areas that the Western Harbour Tunnel is intended to service. Surely it would be better to wait until the Metro is well established before launching this massive project that may duplicate the Metro travel services. The Metro will reduce congestion and use of fossil fuels by private cars.

(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 in travel volumes and patterns in response to COVID-19 have not been considered. A large proportion (52%) of people living in the northern beaches work in the same area. Covid-19 is expected to increase this proportion.

Traffic trends indicate that more people living on the Northern Beaches are travelling to areas like Macquarie Park and Chatswood as these access roads have become more congested. The Northern Beaches link will not help with this congestion, but improved public transport and encouragement of cycling will.

The tunnels proposals will encourage driving but will there be additional parking available for these cars? The City of Sydney is trying to reduce the demand for parking. If city parking is reduced the alternative is the try to park at railway stations but these already have a shortage of parking.

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

There are many unacceptable environmental Impacts. We highlight just a few.

1. Impact on Flat Rock Gully

The use of Flat Rock Gully as a dive site will destroy an area that the local community is proud of for its transformation over 25 years from a contaminated tip to an area with high quality riparian zone and bushland. Part of the area has been declared a Wildlife Protection Area because of its value as habitat. The project will destroy about 7 ha of this bushland and remove over 300 trees. Its value as a wildlife corridor will be significantly diminished

2. Burnt Bridge Creek

The works along the Burnt Bridge Creek will reduce water flows significantly and may destroy the essential cool habitat for the vulnerable Grey-headed Flying Fox. The camp next to the Burnt Bridge Creek has been established for many years and is an important nesting site. The Grey-headed Flying Fox has been severely affected by loss of habitat and foraging sites due to the recent bushfires and urban development. The camp is occupied by up to 10,000 flying foxes.

Noise from truck movements and rock hammering, lights and dust from the construction site in Balgowlah is likely to disturb the camp.

At the end of the construction period Balgowlah Golf Course will become an operations centre and playing fields. The stormwater detention lake will be removed. The bats use this lake as a water source and for cooling in hot weather.

These impacts create a strong risk that the camp will be abandoned.

3. Widening of Wakehurst Parkway

It is proposed that Wakehurst Parkway will be widened from 2 to 4 - 6 lanes. This road runs along a high ridge. The wider road will have many detrimental effects on the wildlife and quality of bushland of the Manly Dam catchment to the east and Garigal National Park to the west. These effects will be more serious if there is lighting along the road that will make it visible from many kilometres away.

An alternative should be considered of continuing the tunnel under the Wakehurst Parkway to the Northern Beaches Hospital so that the widening will be unnecessary. Another alternative that would reduce the cost of tunnelling would be building a narrower tunnel to be used for public transport

only. Public transport can then continue directly to the west (Chatswood and St Ives) or east (Brookvale, Dee Why and Mona Vale). The congestion impacts on feeder roads approaching Wakehurst Parkway would be eliminated.

The current widening proposal will have the following detrimental effects:

- It will affect the ability of wildlife to move across from east to west and vice versa for mating, nesting and foraging purposes. The sides of the road will be fenced off during construction. Some overhead and tunnel crossings are proposed for the finished roadway but the width of the road and the bright lights may deter many animals from movement across the road. A ladder across a 4 lane highway, 40 metres wide with noisy traffic, will be daunting to wildlife. Glide poles have been successful in allowing gliders to cross a highway near Port Macquarie but this example is not a highway with street lighting (ABC, 2018).
- Car and glass strikes are the leading causes of mortality of Powerful Owls, with estimates in Sydney of 12% of the population dying **each year** this way. The relationship between the road way and nearby vegetation must be assessed in order to minimise the risks of road strike by all nocturnal birds. Birdlife Australia's Powerful Owl Project has undertaken detailed research on avoidance of this problem.
- What will happen to fauna during the disruptive construction process and in the longer term? The EIS admits that mobile species will try to move away but suitable habitat may not be available because of competition and lack of suitable food. Where else is there an open ridge with rocky features as occurs along Wakehurst Parkway? The mobile species may not return, for example, the vulnerable Rosenberg's Goanna. Less mobile species may not survive.
- Over 15 ha of bushland will be cleared including 1.5 ha of Duffys Forest endangered ecological community. Biodiversity offsets cannot make up for the loss of this habitat and hence its loss is classified as a Serious and Irreversible Impact under the Biodiversity Conservation Act. The use of offsets will be endorsing local extinctions because of the loss of food sources.
- The loss of a significant area of bushland includes at least 3,500 trees. Many of these species are essential sources of food (seeds, pollen and nectar) for many animals and birds including flying foxes and pygmy possums.
- The road will be built up in parts leading to change in water flows through the bush and edge effects on the neighbouring bushland. Native vegetation is very sensitive to changes in the water table and stormwater flows so additional vegetation that is not cleared will be put at risk.
- Polluted water from the construction and the widened road flow through to the waterways of Middle Harbour and Many Dam, the last unpolluted lake in Sydney. Detention and treatment of water overflows along the length of the Parkway cannot be expected to cope with the high volumes of water associated with heavy rain events that are occurring more frequently.
- The EIS notes that there will be polluted run-off into Curl Curl Creek. This may destroy the habitat for the only population of the unique Climbing Galaxias fish in Sydney (reported to have existed in just one or two small creeks in the Northern Beaches for 60,000 years).
- Biodiversity surveys have identified the areas near the Parkway and, in particular, the Sydney Water land near the Wakehurst Golf Course as habitat for a wide range of fauna species, 5 of which are threatened, namely the Eastern Bent-winged bat and 3 other bat species, Grey-headed Flying Fox, Rosenberg's Goanna and the Powerful Owl. Large parts of their habitat will be damaged. There is also a threatened plant species, the Magenta Lilly Pilly that will be wiped out.
- The aboriginal rock engravings that have already been affected by foot and mountain bike traffic will be further compromised.
- Noise and lighting along Wakehurst Parkway will have harmful effects on wildlife: Light and noise pollution have the potential to affect the physiology, behaviour and reproduction of a range of animal species. Types of effects include changes in foraging and reproductive behaviours, reduction in animal fitness, increased risk of predation and reduced reproductive success. These could have flow-on consequences at the population and ecosystem levels.

Conclusion

The Beaches Tunnels project has been designed to encourage the use of private cars. It is totally inconsistent with the Government's objective to reduce greenhouse gas emissions to zero by 2050. The Project should be abandoned or, at least, radically revised with different parameters that emphasise the use public transport.

The deleterious impacts on bushland and essential habitat for vulnerable species like the Powerful Owl and Grey-headed Flying Fox are unacceptable. The environments of Manly Dam catchment and Garigal National Park are precious areas that have been given conservation status for the ecosystem services they provide, as well as the aesthetic and passive recreation benefits for the residents of Sydney. They must not be degraded by the construction of a brightly lit 4 to 6 lane highway through the middle of them.

Yours sincerely,

Jill Green
President