



Children playing in North Harbour (1938)

North Harbour Community Group
Submission to the EIS for the Beaches Link Tunnel
March 1, 2021

Introduction

The Community Group was established more than 20 years ago to improve the standard of living and amenities in our local area and the greater Manly area through collaborative engagement to ensure community viewpoint is taken seriously in the decision making of Council and State Governments.

The Beaches Link Tunnel has the potential to have a very large negative impact on the amenity of our residents over a very long period of time.

This submission respectfully objects to the EIS for the Beaches Link Tunnel projects – as proposed in the EIS. The project has impact negative impacts on our community and residents in the community.

Reasons for Objections

1. Balgowlah residents will be massively impacted by the construction of the Balgowlah Portal in the Burnt Bridge Creek Deviation and from the use of the Balgowlah Golf Course (opposite the Balgowlah Boys High School) as a construction site for 5 – 7 years. Our golfing amenities will be destroyed and the roads around the construction zone will be a war zone.
2. The Beaches Link Tunnel project has been sold to the residents of the northern beaches on the basis that it will reduce travel times for residents driving to the City and beyond by 30+ minutes. At present it takes 30-35 minutes to drive from Balgowlah to the City in the morning peak, except when there are accidents on the Harbour Bridge/in the Harbour Tunnel/Eastern Distributor. The claim that the tunnel will reduce travel time to the city by 30+ minutes in 2037 is based on a totally unrealistic forecast of the road and traffic conditions in 2037.
3. We assume that the forecast of traffic conditions in 2037 overstates what is likely to be the actual demand because of the widescale adoption of Work-from-Home (WFH) by corporations, government agencies and residents in the northern beaches. On reading the EIS, there is no recognition that the COVID -19 pandemic has caused a paradigm shift in the way people work. The restrictions in 2020 have shown companies and workers that it is not necessary for all workers to travel to their office every day of the week. In the EIS, TfNSW assumes that pre-COVID “normality” will return. They are simply wrong and contrary to the words of the Planning Minister Rob Stokes stated on Friday February 26, 2021
““Pandemics in the past have always had an impact on planning and architecture, and this one will be no different. So, it’s a really ripe time to reflect on what the future will look like ... and reflect that in the built environment,” Mr Stokes said of the draft Design and Place state environmental planning policy, released for exhibition on Friday (26 February 2021).....

.....The policy aims to temper demand for driving and car parking by aligning development with public and other transport options, and have precincts designed with limited block sizes, continuous bike paths and end-of-trip facilities, in what Mr Stokes said would “force a lot more of the thinking and conversation about these things”.

In addition, the modelling upon which the traffic 2037 forecasts are predicated have not included the following much needed improvements to public transport from the Northern Beaches that are now in various stages of implementation:

- the impact of the very successful B Line bus service from Mona Vale to the City,

- the injection of more bus routes travelling from Dee Why to Chatswood
- the widening of Mona Vale road.

On the TfNSW website it is stated that

Northern Beaches and Lower North Shore bus service improvements

“From the 20 December 2020 more than 2,000 additional weekly bus services will be added in Sydney’s Northern Beaches and Lower North Shore.

New services include overnight B-Line services operating between Mona Vale and the Sydney CBD for the first time, and buses operating every 10 minutes on key routes as part of the creation of an all-day frequent network operating throughout the day, seven days a week.

The new frequent routes operating every 10 minutes across the day, seven days a week are:

- Route 100 - Mosman to City
- Route 144 - Manly to Chatswood via St Leonards
- Route 160X - Dee Why to Chatswood
- Route 199 - Palm Beach to Manly via Mona Vale and Dee Why

New B-Line overnight services will be introduced, operating every 30 minutes seven days a week between Mona Vale and the CBD between midnight and 4am. This means the B-Line will now be running 24-hours a day, seven days a week. Overnight services will also operate between Avalon and Manly seven days a week as part of the new network.”

Surely these public transport improvements have several flow-on effects that substantially affect the modelling of the travel time saving benefits for commuters. These include:

1. Lowering the volume of traffic along the traffic corridor from Dee Why to the city and therefore the need for a tunnel
2. Reducing the volume of cars reduces the cost benefit ratio of the business case which by various calculations is very weak (under 1)
3. Increase the payback and reduce the financial attraction for a private partner company to take over the long-term operation of the Beaches Link Tunnel
4. Force an evaluation by Infrastructure NSW to delay the construction of the Tunnel until all these service improvements and WFH impacts have settled into a pattern that would provide more certainty around the traffic forecasts and implied future benefits for commuters.

The modelling upon which the EIS is based has very serious and obvious flaws and it beggars belief that TfNSW has rejected any suggestions to a change in the modelling.

4. There is currently traffic congestion in Manly Vale from vehicles travelling from Allambie Heights, North Manly, Curl Curl, Fairlight and Dee Why in the direction of the Spit Bridge. With the entry to the tunnel in the Burnt Bridge Deviation and an access point on the Deviation for vehicles coming from the Access Road, Manly Vale will become even more congested. This problem is acknowledged in the EIS, but the solution proposed in the EIS can be simplified to “the problem will be sorted out by the Council”.
5. The increased congestion in Manly Vale will result in drivers from Manly using Sydney Road and White Street to enter the tunnel via the Sydney Road Entry – leading to rat runs through North Harbour. This too is acknowledged in the EIS, but once again the solution is to “leave it to the Council”.
6. The extent of long-term irreparable damage to much-loved and valuable green open space and fragile bushland is not recognised in the EIS. Rather, the EIS claims that “suitable mitigations measures will be taken”. This is just not acceptable.

Groundwater flows into the Burnt Bridge Creek will be reduced by around 80% while the tunnels are being built and by 96% after completion of the project. This means that the creek will become a storm water drain – reliant only on rainwater. This will impact on the vegetation along the creek (and including the valuable Baringa Bush Reserve) and on properties bordering the creek as the water table falls. In addition, the quality of water that flows into Manly Lagoon and into the ocean at Queenscliff Beach will fall – and during times of reduced rainfall the water will be polluted.

7. More than 12 ha of high value bushland will be destroyed with the widening of the Wakehurst Parkway from North Seaforth to the intersection of the Parkway with Warringah Road. Because the road widening is to be done on top of a ridge, there will be ongoing problems during construction with the management and control of water during periods of rain. This is even acknowledged in the EIS. The consequence will be that dirty, silt-laden water will flow through bushland in the Garrigal National Park into Bantry Bay and through the Manly Dam War Memorial Park into Manly Dam. The mitigation and control measures proposed by TfNSW are by their own recognition inadequate.
8. Wastewater from a treatment plant next to the water tanks in the North Seaforth Construction Site will channel wastewater through what is left of adjoining bushland within the park into a small pond on the Wakehurst Golf Course. Much of the sludge and siltation will eventually flow into Manly Dam because the small pond can be expected to overflow regularly – resulting in significant pollution in Manly Dam during regular heavy rain events.

9. The Balgowlah Golf Course has been a public golf course for more than 95 years – catering mainly for residents in North Harbour and from the rest of northern beaches. The majority of the residents who play at the course are older than 65. The decision by the government to appropriate the land for a construction site and to build motorway facilities and a ventilation stack was made without any consultation with the members of the golf club. The government has taken the land away from a community – because the government can – and it has legislation to allow it to take away community land. Aside from the gross unfairness of depriving elderly residents with a sport and leisure activity that cannot be replaced by joining another club easily, the 5 – 7 years of construction activity and the conversion of the land into a “recreational precinct” and car parks does damage to what is currently pristine parkland.
10. The wildlife that currently lives in the area and other wildlife from the surrounding suburbs that are dependent on the trees and dams will mostly be lost during the construction period.
11. Our Community Group is of the view that the government is proposing to spend more than \$10 billion to solve a problem that is not as serious as the government tells us. Nowhere in the EIS is there mention of alternates to the tunnel. This is in our view a serious omission.
12. Finally, we respectfully request the DPIE to weigh up the marginal benefits for the State of spending \$10 billion+ against the serious infrastructure needs in Western Sydney and in regional NSW.

Delene Evans

Chairperson, North Harbour Community Group

Email: delene.evans@optusnet.com.au / Ph: 0408 288 115