

Submission on the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement

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Executive Summary

The Beaches Link Tunnel will be vital in easing congestion on Sydney's Northern Corridor and will improve access to the Northern Beaches. However, many in the community have raised environmental and community impact concerns following the release of the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement (EIS). I have outlined my concerns in this submission and further actions that can be taken to ensure the tunnel is done right for the Warringah community.

In summary, the NSW Government should consider the concerns of the community in relation to:

1. **The public exhibition period being extended**; considering substantial pressures on the community over the Christmas-New Year period, including the Northern Beaches COVID-19 lockdown;
2. **a. Mitigating impact on the environment during the construction phase** on sites such as Burnt Bridge Creek, Manly Warringah War Memorial Park (Manly Dam), Garigal National Park and Middle Harbour;
b. Mitigating impact on the community during the construction phase specifically concerning dust levels, noise and vibration, the local road network and residential streets, the rehabilitation and remediation of land post-construction construction and community engagement;
3. **Mitigating long-term community impacts during operation** including ventilation outlets design and air quality, the local road network and ongoing community engagement and review;
4. **Ensuring that the tunnel is future proof** with provisions for clean public transport and active transport consistent with the NSW Government's Net Zero by 2050 target;
5. **Minimising project emissions footprint** with sustainable low emissions materials and clear targets for waste minimisation and resource management.

1. Introduction

- 1.1 Thank you to the NSW Government for the opportunity to provide feedback on the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement (EIS).
- 1.2 We are living in a period of transformation. Our cities are growing and sprawling, and congestion is worsening, particularly in the Northern Beaches. Climate change and environmental destruction are putting pressure on our living environment.
- 1.3 All these forces are acting on our transport infrastructure. We therefore need fit for purpose and future proof infrastructure built in the most environmentally responsible way possible that allows us to travel efficiently.
- 1.4 The Spit Bridge is not up to the task. Built in 1952, it is archaic, disruptive and leaves the residents of Warringah frustrated at the congestion it exacerbates. In a 2019 survey of constituents, 67% of residents of Warringah rated Military Road as their most significant hotspot, followed closely by Spit Bridge at 60%.¹
- 1.5 The Beaches Link Tunnel is a crucial project in the New South Wales Government's 'Future Transport 2056' strategy. It will be vital in easing congestion on the Northern Corridor which is the 4th most congested corridor in Sydney in the afternoon² and will mean improved connectivity to the Northern Beaches.
- 1.6 The long-awaited EIS is a substantial document and an improvement on the reference design released in 2018. Nevertheless, I have met with community groups and received a large amount of correspondence about the EIS, and I know that many within the community would like to further mitigate the environmental and community impacts outlined within and would support greater provisions for improved public transport in the project design. I agree, the tunnel must be done right.
- 1.7 I have met with many resident groups to discuss the community concerns about the project.

2. The EIS public exhibition period

- 2.1 The Beaches Link project has been ongoing since March 2017 when the corridor was identified by the NSW Coalition Government. This has been a lengthy process for community members and subject to much debate. The community has been waiting for

¹"Survey Results", Zali Steggall, 2021 ,https://www.zalisteggall.com.au/zali_steggall_survey_result> [access 24 February 2021]

² Infrastructure Australia, Urban Transport Crowding and Congestion The Australian Infrastructure Audit 2019 Supplementary Report (2019) < <https://www.infrastructureaustralia.gov.au/publications/urban-transport-crowding-and-congestion>> [accessed 25 February 2021]

the EIS for a long time, with the release being delayed from mid-2020 to 9 December 2020. It is a lengthy and complex document, with many annexures.

- 2.2 As such, it is not acceptable that the EIS was finally released prior to Christmas but the community was only given a small window of time to assess the enormous amount of documentation and provide feedback. The release of the EIS also coincided with the Northern Beaches lockdown when many people were devoting their time to protecting their families, abiding by NSW Government health orders and keeping their businesses afloat.
- 2.3 I join the many local community groups, individuals and school P&C Associations in objecting to this inadequate public exhibition period and request an extension. This is especially relevant for local schools, who have concerns about the EIS relating to the health and safety of students and staff, traffic congestion and air quality. I note that NBSC Balgowlah Boys High School has not been specifically identified as a sensitive community receiver site in the EIS, despite being located just 322 metres from the Balgowlah ventilation outlet, opposite a temporary construction site and near the tunnel portal. This must be addressed, and further consultation is required.

3. **Impact on environment and community during construction period**

- 3.1 Projects of this scale have unavoidable environmental and community impacts. It is nevertheless essential that the NSW Government and project contractor do their utmost to minimise these impacts during the extended construction period. Whilst the EIS details the mitigation strategies and requirements that Transport for NSW (TfNSW) and the project contractor will utilise and must abide, during construction, some of the pre-construction assessments, mitigation strategies and requirements are not best practice and will result in avoidable damage to local environments and impacts on the community. Some specific areas of concern in respect to environmental impacts include:

Burnt Bridge Creek

- 3.2 The estimated 96% loss of water base flow in Burnt Bridge Creek will have significant downstream impacts on Manly Lagoon and severe impacts on aquatic habitat and ecosystems. I note Northern Beaches Council has concerns that the implementation of measures to reduce groundwater drawdown are very selective and that monitoring groundwater and developing mitigation during works may not be effective as the best possible response to mitigating drawdown. I support the Northern Beaches Council's request of a review of the impact of the predicted water table drawdown and further analysis/recommendation on Burnt Bridge Creek be undertaken.

Manly Warringah War Memorial Park (Manly Dam) and Garigal National Park

- 3.3 Whilst mitigation strategies have been detailed in the EIS that aim to protect the environment, including threatened species in Manly Dam and Garigal National Park,

there remains significant concerns that these mitigation strategies need to be increased to lessen impacts on the surrounding landscape and threatened ecosystems. This includes a review of the management of runoff of sediment and asbestos pollution during construction, which could lead to contamination in waterways including Manly Dam, Manly Creek and Trefoil Creek.

- 3.4 In relation to the protection of wildlife habitat and connectivity, which will be impacted by the Wakehurst Parkway works, I support the Northern Beaches Council's request for a vegetated fauna overpass to be included in the project design to allow for migration of fauna across the corridor. There is also community concern about the use of lighting during construction and operation and its impact on wildlife. I request that more detail be given on the timing of and type of lighting intended to be used during construction and then ongoing to ensure minimal impact on wildlife and the local community.
- 3.5 Northern Beaches Council's position includes concern that the project operational water quality design targets would not be achieved at the Wakehurst Parkway site, impacting for example the freshwater habitat of Manly Creek and the threatened climbing galaxias population. I therefore support Northern Beaches Council's request for off-corridor solutions to be developed to manage the quality of water discharged from the site into sensitive catchments.
- 3.6 The EIS does not adequately identify environmental and biodiversity impact in surrounding environments to the identified project area. This should be assessed and addressed as part of the project scope. These include sites such as Manly Lagoon, Queenscliff Beach, Manly Beach and the natural environment adjoining the Wakehurst Parkway east construction support site, as also identified in Northern Beaches Council's submission.
- 3.7 Further, the EIS outlines potential impacts on mountain biking and walking trails. I commend the recent mountain bike stakeholder meeting and the resultant mapping of the trails. Numerous trails including those in Manly Dam will be adversely affected by the widening of the Wakehurst Parkway. Further assessments and plans should be undertaken to mitigate the impact on mountain biking trails and for the provision of connectivity for bushwalking between Manly Dam and Garigal National Park.

Middle Harbour

- 3.8 The project will involve dredging and the movement of contaminated sediment in Middle Harbour. The EIS does detail the use of sediment curtains to protect the harbour during this process, but there is concern that these strategies are not best practice. I recommend modifying and increasing such mitigation strategies to ensure minimal impact on the marine environment. Northern Beaches Council has requested that the monitoring of marine ecology and marine water quality during construction include sensitive marine habits and biota, and contaminants in marine waters. I strongly support this request.

Dust levels

- 3.9 Whilst TfNSW will prepare a Construction Environment Management Plan (CEMP) and associated sub-plans to manage dust, including the use of dust suppression measures and requirements relating to air quality and dust, as set by the Environmental Protection Authority, the EIS contains little detail about what daily monitoring of dust around all sensitive receivers, including schools and childcare centres, will occur and how this will be carried out. The community must be notified and consulted on the appropriate mitigation measures that will be applied throughout the construction period. Further, it is unclear how tailored dust mitigation measures for specific receivers will be determined or when these will be implemented. As there are likely to be unpredicted exceedances of dust levels, this is of the highest priority and needs to be specifically addressed in the CEMP prior to the project progressing.

Noise and vibration

- 3.10 This project will create significant noise and vibration during the construction period, which is estimated to last six years. I acknowledge mitigation measures proposed such as acoustic sheds over tunnelling sites, however, the movement of heavy vehicles and blasting will create significant disruption for the surrounding community, particularly schools. I join Northern Beaches Council's objection to blasting along the Wakehurst Parkway and call for less disruptive excavation processes.
- 3.11 I would also request that regular in situ monitoring and assessment of noise and vibration impacts at every sensitive receiver location, including all schools and childcare centres occur. Tailored mitigation measures may be needed to ensure the most effective mitigation methods are utilised. The community must be kept up to date and consulted on this throughout the construction period. The EIS is unclear on how the need for tailored noise and vibration mitigation measures for specific receivers will be determined or when these will be implemented. Northern Beaches Council request has requested a register of sensitive receiver locations to support of this monitoring and evaluation. This should be included.

Local road network and residential streets

- 3.12 There will be considerable impact on local roads during the construction, in particular due to the forecast number of heavy and light vehicle movements around sensitive receivers such as local schools and the potential for rat-running as drivers try and find the quickest routes to their destination. Monitoring of rat-running and strategies to inhibit this must be included in the project conditions.
- 3.13 Whilst TfNSW staff specified during the recent virtual information sessions the anticipated direction of truck movements removing spoil during construction, it will be up to the contractor to determine what routes trucks will take. This is a major concern and not acceptable. Truck movements should be monitored as a condition of the project, to ensure the contractor abides by these and the community impact is reduced.
- 3.14 Increased pressure on local parking is feared as workers park on residential streets, even though there will be dedicated worker parking at temporary construction sites. Further

conditions re monitoring of worker parking needs to be incorporated into the project to ensure workers do not park in residential streets for the entire construction period. Encouraging workers to take public transport or not to park on surrounding local streets, as was mentioned by TfNSW staff during the recent virtual information sessions, is not a sufficient measure to ensure this does not happen.

- 3.15 A Traffic Coordination Group needs to be established for the project with site specific meetings and should include community representatives for specific sensitive receivers and locations to ensure community feedback directly to TfNSW during construction on the impacts being felt by residents and sensitive receivers. Workable strategies need to be formed collaboratively to manage and mitigate these as a priority.

Rehabilitation and remediation of land post-construction

- 3.16 The EIS details plans for remediation and rehabilitation of temporary construction sites and environmental corridors. It also addresses acquired land plans post-construction, including the promised new green space and recreation facilities in Balgowlah. Conditions should be included in the project and placed on the contractor to ensure these sites are returned to the community in a state and timeframe that has been agreed to by the community and stakeholders, prior to the start of construction. More information is also needed on how the community will be updated and consulted on remediation works throughout and post-construction. Northern Beaches Council has requested for a consultation group to be established that includes the community and stakeholders, to work collaboratively on this, which I support.

Community engagement

- 3.17 Whilst I understand that TfNSW will adhere to a community engagement strategy for the project, communication with the community during construction is vitally important to ensure timely notice and consultation on the project's progress and any potential changes or issues that arise. There must be clear communication and consultation processes for residents and sensitive receivers, including schools and childcare centres.
- 3.18 Regular community project briefings should occur face-to-face at scheduled times throughout the construction period, to be agreed to prior to the start of the project and as needs arise. I support NBSC Balgowlah Boys High School P&C Association's request of the establishment of a Working Group with NBSC Balgowlah Boys Campus and its P&C to provide a forum to identify and appropriately manage construction and operational issues and suggest that such Working Groups be established for other sensitive receivers.

4. Long-term community impacts during operation

- 4.1 As with any infrastructure project, there will be positive and negative impacts on the community. Therefore, world's best practice design and mitigation strategies must be implemented to minimise any negative impacts.

Ventilation outlets design and air quality

- 4.2 Whilst the EIS points to the independent NSW Chief Scientist and Engineer's report on road tunnel air quality to dispute the need to include air filtration, many do not agree with this principle as it applies to the Beaches Link project.
- 4.3 The base data sets used in the EIS in modelling air quality in Balgowlah and Seaforth have been questioned, as has whether data from any unfiltered tunnels longer than 6km, which the Beaches Link will be, has been assessed. Modern road tunnel designs overseas use air purification and/or filtration systems in countries like Japan, and cities like Madrid and Stockholm. TfNSW should utilise best available technology in the design of the Beaches Link.
- 4.4 In 2008, Premier Gladys Berejiklian concurred with this sentiment, stating in Parliament that "world's best practice is to filter tunnels." In questioning the then Labor Government as to why they were not filtering the Lane Cove Tunnel, the Premier said, "why won't they allow people to sleep at night, knowing that their children aren't inhaling toxins which could jeopardise their health now or in the future." This is particularly poignant, given that the Beaches Link ventilation outlets will be close to schools.
- 4.5 It is with this statement in mind, that I put the same question to the Premier and ask for the Beaches Link ventilation outlets to be filtered, as world's best practice. The NSW Government should adopt the lowest-risk approach when it comes to the community's health and the Government has the available technology to do so with this project by installing filtered ventilation outlets thereby further reducing air pollution health risks. Leaving these ventilation outlets unfiltered is not good public health policy.
- 4.6 Whilst TfNSW states that they will continuously monitor air quality within the ventilation outlets and tunnel 24 hours a day during operation, and ambient air quality monitoring will also be carried out for 12 months before construction, this is likely to only occur for 24 months after the tunnel opens. Air quality monitoring cannot be temporary as it will have a long-term impact on the health of our community.
- 4.7 Whilst the location of these monitoring stations and duration of monitoring will be determined by the Beaches Link Air Quality Community Consultative Committee (AQCCC), it is unclear what the enforcement power of this Committee will be to ensure best practice, long-term air quality monitoring particularly around all sensitive receivers, including schools and childcare centres, during construction and once in operation.

Local road network

- 4.8 The project will have ongoing impacts during operation on local roads in Manly Vale, Fairlight, North Balgowlah, Seaforth, Balgowlah Heights and Clontarf, particularly around the Beaches Link access portal in Balgowlah. Such impacts are a major concern to residents and local schools. I strongly agree with the Northern Beaches Council concern that the traffic modelling provided in the EIS does not effectively assess the impact of the Beaches Link on traffic congestion on local roads. Planned measures by TfNSW to support Northern Beaches Council in mitigating such impacts are inadequate and must be addressed.
- 4.9 Northern Beaches Council's submission outlines several remedial actions that can be taken to mitigate these issues, which I support, including a dedicated bus lane at Kentwell and Condamine Streets through Manly Vale, traffic amelioration measures to reduce rat-running and prevent increased traffic on streets approaching the tunnel, and provision for North-South access between Maretimo Street and the Beaches Link. I support the request for an impact study to look at these various scenarios for the Balgowlah area.

Ongoing community engagement, monitoring and review

- 4.10 Once construction is completed and the Beaches link is operational, it is vital that communication and consultation with the community is maintained and remains consistent. There needs to be ongoing review of the tunnel operations in order to assess community impact and address issues that may arise. Avenues of communication and future monitoring and management strategies, as well as the requirements that will be placed on the tunnel operator as part of any agreement, should be communicated to the community prior to the start of construction. The community must be reassured that their health, safety and quality of life will be maintained once the tunnel is operational.

5. The tunnel must be future proof

Clean public transport

- 5.1 The Beaches Link presents a huge opportunity to the NSW Government to provide a public transport system to the Northern Beaches that is world leading. As illustrated with the success of the B-Line, when fast and efficient public transport is provided, the community will gladly use it.
- 5.2 Currently, there is a lack of public transport options on the Northern Beaches and the Beaches Link provides the opportunity to upgrade our local infrastructure and facilitate better, cleaner and faster public transport. This is supported by Northern Beaches Council's 'Move Northern Beaches Transport Strategy 2038.'

- 5.3 In its current form, the project does not prioritise dedicated public transport lanes in the tunnel and does not include clear plans on what future public transport services will be provided in the Beaches Link, the patronage targets for these services and provision for the electrification of public transport. In addition, TfNSW has not included any provision to ensure direct access to North Sydney's metro transport hub for buses via the Beaches Link in order to improve connectivity, public transport travel times and reduce traffic on surface roads.
- 5.4 As we have seen with the Lane Cove Tunnel and Eastern Distributor, without dedicated public transport lanes, buses become stuck in traffic and thus are inefficient and only work to contribute to traffic congestion. A dedicated lane must be included in the updated project design.
- 5.5 Whilst the EIS contains information on traffic modelling undertaken by TfNSW to assess the project's future capabilities, the traffic modelling has not been done far enough into the future. For a project of this scale, traffic modelling should be further into the future than 10 years post-construction. I request that the traffic modelling be revised to reassure the community that the Beaches Link can adequately cater for our growing community for the long term.
- 5.6 This project offers the NSW Government the opportunity to build a state-of-the-art tunnel connection that not only reduces road congestion but also reduces greenhouse gas emissions in alignment with the NSW Government's Net Zero target by 2050. The tunnel should therefore be built with the provision of low emissions public transport capacity, including high volume options like an electric trackless tram as a priority. This is not detailed in the EIS, therefore I request that this be included to ensure the project caters for our growing city.

Integrated active transport

- 5.7 The Beaches Link provides an opportunity to offer commuters more choice in transport options, including active transport. As the Beaches Link is part of the North Sydney transport network, the scope of this project should extend to provision of active transport connections and linkages including walking and cycling lanes throughout the network. This will encourage users to reduce reliance on cars and further reduce traffic congestion.

6. Project sustainability

- 6.1 The world needs to rapidly decarbonise to limit warming to an acceptable level and escalating impacts of climate change. This means achieving Net Zero by no later than 2050. Many in the community have welcomed the NSW Government's commitment to Net Zero by 2050. The Beaches Link project must be consistent with this commitment.
- 6.2 The EIS estimates that 723.7 kt CO₂-e will be emitted over the construction period. Of that, 42.2% of emissions will be produced by the construction of the project and 38.3%

from terrestrial electricity consumption.³ To mitigate the emissions from energy consumption, the EIS proposes undisclosed energy efficiency measures. Construction emissions will be managed as part of a ‘Sustainability Management Plan’ in line with the Infrastructure Sustainability Council of Australia’s rating system.

- 6.3 Whilst I welcome these commitments, more detail and transparency must be included on what specific measures will be implemented. Crucially, it is unclear if the project will utilise sustainable and low emissions materials during construction. The NSW Government must mandate that sustainable materials are a condition of the project. I also support Northern Beaches Council’s request that the detailed design and procurement phase of the project should set targets for resource management and waste minimisation.

7. Conclusion

- 7.1 I thank the NSW Government and TfNSW and its staff for the work it has done to date on the Beaches Link project and request that the concerns and requests outlined in this submission on behalf of the Warringah community be taken into consideration and actioned, to ensure this project delivers world class transport infrastructure for our community long into the future.
- 7.2 Finally, I wish to thank the many members of our community who have given their time to assess the EIS and provided invaluable feedback.

Kind Regards,



Zali Steggall OAM, MP
Federal Member for Warringah

³ Transport for NSW, *Beaches Link And Gore Hill Freeway Connection Chapter 26 Climate Change And Greenhouse Gas* (2020), 9 <<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-8862%2120201220T233142.345%20GMT>> [accessed 1 March 2021].