

Beaches Link Tunnel EIS

Submission in Objection

Seaforth

1 March 2021

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1 March 2021

Objection to the Beaches Link Major Project by Transport for NSW
Submission in response to the Environmental Impact Statement

There are several areas of significant personal impact to myself and my family, presented in this EIS. They result in my objection to the Beaches Link Major Project for NSW.

1. Lack of Filtration on the Ventilation Stacks during operation
2. Impact of project construction and operation on Flora and Fauna
3. Misrepresentation of the visual impact of the ventilation stacks with no true to scale schematics throughout the EIS and all known communications from Transport for NSW to the Community.
4. Direct impact personally, financially, health and property of construction
5. Complete lack of communication from Transport for NSW directly as sensitive receivers thereby concluding that the social impact data is not correct nor accurate and the representation that the community is in support and has been consulted has not been met.

The fact that the EIS was released on the 9th of December 2020 and closes for public submissions on the 1st of March when it was over 11,000 pages of high level content, has not been giving the community a true opportunity to respond.

Where there is ease in information it is in relation to the challenges The Beaches Link is stating to address and resolve/improve.

February 2021

When we are looking to the very real challenges to Flora & Fauna, Biodiversity, Human Health, Air Quality, Impact, Personal and Social Impact; the EIS is not made for ease of reading for the general public whose response is relied upon when they will be most affected.

My research of the EIS has led me to conclude that I am completely opposed to The Beaches Link Major Project and submit that this EIS has not met the requirements of the Secretary and therefor the project cannot be approved and must be resubmitted.

In the following pages you will find my direct commentary on different chapters of the EIS that have direct human impact to myself, my properties and my family.

This is inclusive of my 93 year old father who lives full time in the property at [REDACTED] where we have an expectation of a peaceful life.

My daughter and son do not deserve to sit in their home breathing in toxic fumes because the effect or cost to the government is seen as negligible. I am personally devastated at the impact to Flora and Fauna. We have personally financially sacrificed and invested to support native regeneration, habitat corridors and have kept 5 acres in Seaforth of prime Harbour frontage untouched for biodiversity.

My residents in my properties do not deserve to go through this experience or have their human impact of toxic fine particulate matter realised.

I have questions both for myself personally and for the community throughout this document and will request that all queries are responded.

I have also included recommendations for inclusions in a revision of the EIS as this current form does not meet the requirements.

I have covered all of my concerns across the project in responses from the Executive Summary to Chapter 15 in order of the document.

Finally, I would like my submission to be considered numerically and statistically as a submission for each of my above listed properties as a Stakeholder for the project for each.

EXECUTIVE SUMMARY

The Executive Summary states that the Blue corridor will reduce the cost of business travel. It also states that this Beaches Link is part of the “3 cities vision” where people work and live within their city/region/hub. The conflicting objective implies that this will benefit the residents of the Northern Beaches when the data regarding population and work growth does not support this. Therefore the Project Objective ‘ *To support longer term increases in transport demand by providing increased capacity between the Northern Beaches region and the rest of Greater Sydney*’ is neither accurate nor met.

The key features of the Beaches Link component of the project as shown in [Figure E-5](#) that concern us mostly as direct community receivers are:

- *The crossing of Middle Harbour between Northbridge and Seaforth would involve three lane, twin immersed tube tunnels.*
- *Twin two lane ramp tunnels:*
 - *Eastbound and Westbound connections between the mainline tunnel under Seaforth and the surface at Brunt Bridge Creek Deviation, Balgowlah (about 1.2 kilometres in length)*
 - *Northbound and Southbound connections between the mainline tunnel under Seaforth and the surface at Wakehurst Parkway, Killarney Heights (about 2.8 kilometres in length)*
- *Access road connection at Maretimo Street and Sydney Road, Balgowlah*
- *Upgrade and integration works along Wakehurst Parkway at Seaforth*
- *Ventilation outlets and motorway facilities at both Burnt Bridge Creek Deviation in Balgowlah and Wakehurst Parkway in Killarney Heights*
- *Other operational infrastructure including groundwater and tunnel drainage management and treatment systems, pavement works, surface drainage, signage, tolling infrastructure, fire and life safety systems, roadside furniture, lighting, emergency evacuation and emergency smoke extraction infrastructure, Closed-Circuit Television (CCTV) and other traffic management systems.”*

The Project construction as discussed in [E-11](#) will have significant direct impact on my properties referred to in the title of this submission.

- *“The Construction of the Beaches Link component of the project would include works underground, underwater and at the surface. The of the tunnel for the project would be constructed using road headers.”*

- *“Temporary cofferdams would be constructed within Middle Harbour off the shoreline at Northbridge and Seaforth. The cofferdams would be used to construct underground connection structures, called interface structures, which are required to connect the immersed tube tunnels to the land tunnels.”*

My questions regarding the project description and construction in the Executive Summary:

1. Why have we had no direct communication from Transport for NSW considering that we will have 6 tunnels being dug immediately impacting our properties in addition to the impacts in Middle Harbour where our properties are on the Shoreline?
2. Seaforth Crescent (the road surface) is 80 meters above where our properties are and where we live. All measurements in diagrams consistently throughout the document are from Seaforth Crescent road surface and then the Harbour Water Line. We are within meters of the harbour line but utilise an inclinor to get up to Seaforth Crescent road surface. Why have we not been identified as sensitive community receivers and if we have, why have we not had direct communication?
3. Can you please explain this oversight?

Noise and Vibration (E-22. E-23)

It is of great concern to us directly on the human & health impact firstly, and secondly the mitigation to protect our properties that we will experience the direct effects of 24 hours a day of tunnelling and with all the direct impact of the chaos from the ground support.

Your document states:

- *“While the noise levels for the realistic worst case might occur at sensitive receivers during the works, noise levels associated with the typical scenario would occur more frequently.*
- *“ Where airborne noise management levels are exceeded, there would be a requirement to implement reasonable feasible noise mitigation.*
- *“Some receivers have the potential to experience vibration levels above the human comfort criteria when rock hammers are operating near by.*
- *“....For these receivers, further assessment would be carried out to determine the susceptibility if the structure to be potentially damaged by vibration, and mitigation measures from the Construction Noise and Vibration Guideline would be implemented.”*

1. I refer to my previous question as to why we have not been identified as sensitive receivers?
2. I would request the house modelling be carried out in reference to each of our properties and would require an assessment for both Noise and Vibration. Again, if we have al-

ready been identified as sensitive receivers, I would query as to why we were not directly communicated with as we have only identified ourselves as sensitive receivers by going through your data provided in the 11,000 pages of the EIS.

3. I would request full transparency regarding all mitigation that will be taken to protect us and our properties throughout the construction process.

Air Quality E-23,E-24

- *“Air quality impacts during construction*
- *A comprehensive range of mitigation measures would be used so that any residual dust and associated human health impacts would be negligible.”*
- *Air quality impacts during operation*
- *The ventilation system would be designed so that there would be no emissions from tunnel portals. All emissions would be via ventilation outlets. Under expected traffic conditions, the predicted contribution of tunnel ventilation outlets to pollutant concentrations at ground level was negligible for all receptors.”*

I strongly disagree with this statement and analysis. I, and my residents and family are receptors of the unfiltered smoke stacks, as is the whole community. We are direct receptors from both unfiltered smoke stacks and any damage is not negligible to our human life. Any suffering is not negligible.

1. How will you be modelling the measures and when will we be assessed?

- *“Where traffic on roads is expected to reduce due to diversion to the tunnels. Ambient air quality is expected to improve compared to conditions without the project.”*

2. I strongly disagree with this statement and do not believe that our community will experience better air quality with unfiltered smoke stacks introduced. It is a complete falsehood and would query how you have modelled that for our properties, Seaforth Crescent, Seaforth and Balgowlah and how the Biodiversity and Fauna will be improved with the above.

Human Health Impacts E-24

... *“however, for some areas located near key surface roads, a small increase in pollutant concentration may occur. Potential health impacts associated with changes in air quality (specifically nitrogen dioxide (NO₂) and particulates) within the local community have been assessed and are considered to be acceptable.”*

We will address our opposition to this statement with direct questions in our response to the relevant chapter.

Socio-Economic impacts

I do not support the business case for the Beaches Link Tunnel. I do not agree that it will meet its stated objectives.

Heritage Impacts (Non Aboriginal and Aboriginal) E-25, E-26

I do not support that “*operation impacts are considered to be negligible*”. The 10 Aboriginal Sites identified on E-26 ‘*may be subject to indirect impacts associated with vibration and settlement*’.

1. I would ask that the Aboriginal heritage interpretation strategy included local indigenous community representatives that are independent from government bodies. It is acknowledged that the eleventh site (45-6-0662) has not been able to be located.

2. I would request that the Aboriginal Heritage Information Management System in conjunction with Transport NSW conducts a complete inspection and report of all Aboriginal Heritage sites that have been ‘lost’ or cannot be located near any Transport for NSW major projects.

3. I would also ask if there is any data available on the impact of vibration on these sites around the building and major projects works of the Frenchs Forest and Northern Beaches Hospital Construction site as it is managed by the same government bodies preparing this project. If it is not, I would question why?

I am opposed to the potential damage to Clive Park and Tidal Pool in Northbridge and the decimation of the Balgowlah Golf Course.

Biodiversity (terrestrial and marine) impacts E-26, E-27

I am extremely concerned around the impact on native vegetation, endangered species and Fauna. The construction footprint will have detrimental effects and I am opposed to that being considered negligible.

I do not agree with the premise of the tunnel or the business case that is conflicting in purpose.

1. INTRODUCTION

Throughout the document but initially in the overview (1.1) the Greater Sydney Region Plan - A Metropolis of Three Cities (Greater Sydney Commission, 2018a) is often referred to as part of the business case to justify the tunnel. It states ‘ *a vision of three cities where most residents have convenient and easy access to jobs, education and health facilities and services*’. The document later states, “ *providing new levels of access to jobs, recreation, and services such as schools and hospitals*’.

The document also refers to the benefits for freight, public transport and private users.

I query as to what measures are in place to restore public transport to the Northern Beaches as Route 8 was sold by the NSW government last year and was the last remaining public transport. All ‘public transport’ on the Northern Beaches is now privately owned and as such Transport for NSW would have to restore public transport as the routes have been significantly cut since privatisation and would only run on for profit basis.

I query as to whether there are any dedicated public transport or bus lanes in the tunnel as it is not consistent in the drawings.

1. I question as to whether there are dedicated bus lanes on entry and exit to the tunnel?
2. As freight is also referred to throughout the EIS as a beneficiary of the Beaches Link, will freight be allowed to use it?
3. If not, as they will be using Military Road and Spit Road, I query as to the local benefits if said roads become the freight route as it appears in your document.

I also query the benefit to the residents of Manly if the NSW Government and Transport Minister Constance and local Member of Parliament James Griffin, had not got rid of the Manly Ferries (saving 2 until 2023 when the tunnel construction begins). When public transport has been significantly compromised until there is none left that is publicly owned on the Northern Beaches, people are driven to cars. Cars on roads that get tolled. Tolls that get privatised. With the changes in how we work from home, the RMS numbers need to be updated to reflect the significant changes to how the community travel over the past year. I do not agree with the general premise of the tunnel being of benefit to the people of the northern beaches at all. In fact it will be a severe detriment.

I do not think there has been enough research into the impacts on Flora and Fauna.

1. I am concerned as to the air emissions from ventilation outlets and would request that there is independent data made publicly available pre during and post construction and that there are measures for filtration to be added when it is confirmed hazardous.

2. I would request the timeline for that also publicly available along with ongoing monitoring data from the Chief Scientist.

3. The Beaches Link is referred to as a tolled motorway. Could you please confirm the tolls and provide the community with the cost comparison?

My understanding is that it will be significantly more expensive for all users and toll avoidance will directly impact the streets around Seaforth and Seaforth Crescent specifically.

I find the proposal contradictory throughout and completely inaccurate in some of its modelling. I do not agree with the premise for the tunnel or the estimation of saved travel times.

2. ASSESSMENT PROCESS

Airports Act 1996 and Civil Aviation Act 1986 (EIS 2-6)

- *"...potential to affect prescribed airspace.*
- *"....For this ventilation outlet, the plume velocities would exceed the OLS under the capacity case when considered in conjunction with the ventilation outlet for the Western Harbour Tunnel at the Warringah Freeway. As such, a plume rise application would be prepared for approval under the Airports Act 1996 for the ventilation outlet and motorway facilities at the Warringah Freeway where it may constitute a controlled activity."*

1. As I will not accept that the unfiltered ventilation stacks will have acceptable levels of risk to our human health, I query as to how much will be spent on monitoring and catering for the air space and how much filtration on the ventilation stacks will cost comparatively?

2. As the Assessment process has defined that responses to submissions will be in August 2021, I would ask to be responded to directly regarding my impact concerns as a sensitive receiver.

I do not believe there was transparency in information of the impact for sensitive receivers across Seaforth Crescent particularly those of us with harbour water level properties as opposed to where the surface road is and all documented measurements have taken place from. It is inaccurate and therefore I do not believe that the stakeholder engagement met the minimum standards set out nor do I believe the assessment process is reflecting best practices.

3. STRATEGIC CONTEXT & PROJECT NEED

3.2.2 Limited transport options connecting the region (EIS 3-8,3-9)

As referenced in Figure 3-4 (EIS 3-10)

• *“Sydney’s worst road congestion occurs between Balgowlah and Sydney Harbour through Mosman and Cremorne..... However, even with the bridge down, morning delays on this route are greater and more unpredictable than other routes in Greater Sydney, As a result, Balgowlah commuters to the Sydney CBD need to allow 40 minutes to get to work on time; or 23 minutes longer than the trip would take without traffic (Grattan Institute, 2017).”*

This EIS has incorrect data claims that in 2037 the time savings for drivers from (e.g.) Brookvale and Balgowlah will save 30+ minutes to drive to the city, the airport and beyond when it currently takes less than 35 minutes to drive from Balgowlah to the City.

EIS Figure 3-8 Change in journey times in the AM peak as a result of the program of works by 2037 (EIS 3-18)

These claims assume a number of vehicles that have been forecast/modelled to be driven to the city and beyond. These forecasts were made in 2016 for traffic flows 21 years into the future. There is plenty of evidence that traffic forecasts that far into the future are very difficult to make and the confidence level around these forecasts is wide and subject to challenge.

If these forecasts are wrong, the claim for time savings is wrong and the \$-value benefit in the Benefit Cost Analysis (together with the Benefit Cost Ratio) will be wrong. In addition, the value of the toll revenue for the operator will be wrong – as will the amount an investor in the tunnel is prepared to pay the government.

The vehicle flow forecasts for 2037 were made without considering:

- Dee Why to Chatswood Express Bus Service (or a B-Line Service) that commenced service in January 2020.
- The move to Work-from-Home (WFH) that has developed with the introduction of a range of restrictions to control the spread of COVID-19. Transport for NSW have evaluated the movement to WFH effect as “temporary”.

There is plenty of evidence that WFH in one form or another will be a permanent feature in society. At present, approximately 52% of workers on the Northern Beaches do not travel outside the Northern Beaches for their work. With the wider adoption of WFH and the establishment of WFH Hubs, this rate could increase to 80% - as residents whose traditional place of employment is outside the Northern Beaches work from home 2-5 days per week. A number of large employers (including Transport for NSW itself and many government departments) have officially adopted a hybrid form of WFH.

If the government decides to proceed with the Beaches Link project, there is expected to be a rapid adoption of WFH because of the construction itself - increased congestion in Manly Vale and along Sydney Road due to the construction activities in the Burnt Bridge Creek Deviation and on the Balgowlah golf course site. Moves to WFH during this period will become more permanent, as will the establishment of profitable WFH Hubs in and around Manly – further reducing the number of vehicles needing to travel to the city (and beyond), particularly during the AM peak.

The EIS states:

- *“Ongoing and continuous traffic surveys carried out by Transport for NSW indicate that the 2016 baseline year is appropriate for modelling purposes as there is little material difference between 2016 and existing (2020) traffic conditions in the project area.”* (EIS Chapter 9-7).

Whilst private vehicle traffic has returned to approximately 90% of pre-COVID19 levels, public transport is down 40-50% (from Opal card data) – showing the number of commuters has decreased significantly, despite the health risk diminishing.

The EIS states that according to traffic modelling, the traffic along Military Road will fall by 11% once the tunnel project is completed:

- *“Peak period traffic demand on Military Road and Spit Road would decrease as a result of the project, by up to 11 per cent and 33 per cent respectively.*
- *Peak period traffic demand on Warringah Road would decrease as a result of the project by up to 23 per cent. “*

Reference EIS Figure 3-9 Change in average weekday traffic volumes (two way) on key road corridors by 2037 (EIS 3-20)

If the traffic volume forecast for 2037 are wrong (i.e. too high), the claim of a relatively small reduction in traffic along Military Road of 11% will be too high – and reduction in traffic will be less than 10%.

It is therefore likely that the implied claim by Transport for NSW that residents in Mosman and Cremorne will experience a major/dramatic reduction in traffic is wrong, and hence does not align with the stated objective for the project.

Based on a realistic forecast of traffic volumes for 2017, it will be established that this very expensive infrastructure project (in its current form) is not necessary. The money could be better spent in expanding the very popular bus transport options and establishing community WFH Hubs that have the potential of improving active transport in the Northern Beaches and the amenity for so many residents that are ultimately bearing the construction fatigue and ex-

treme health risks for a project that ultimately does not benefit the population that pay the price.

3.6.2. Creating faster, more reliable journeys for freight services and other road users between the Northern Beaches region and other strategic centres across Greater Sydney (EIS 3-21, 3-22)

The EIS states:

- *“the project would support the operation of the B-Line as well as local and inter regional buses, by improving travel times as evidenced by the new rapid bus service from Dee Why to Chatswood which is currently being planned, which would benefit from reduced congestion on the Warringah Road corridor.”*

1. I question as to whether this bus service from Dee Why to Chatswood will be a public service operated by Transport for NSW or whether it will be privately owned and operated.

2. If it is not a public transport service I would question its inclusion in this document as a benefit to a private enterprise is not outlined in the objectives the EIS is required to meet.

3. I would also question as to what modelling was used to value the private enterprise and if that modelling included provision for the Beaches Link to not proceed.

Reference Figure 3-10 Express bus routes and connections to strategic centres (EIS 3-22)

4. PROJECT DEVELOPMENT & ALTERNATIVES

I quote from your document:

- (Alternatives considered E-14 & E-15), *“ Selection of the preferred corridor required consideration of various technical, environmental and community factors including:*
 - *.....reduce whole life of emissions, operational costs, and improve safety outcomes”*

The emissions that will be flowing directly to our community and family do not improve our human safety outcomes.

Beaches Link EIS, Chapter 3, Section 3.4 states:

- *“The Western Harbour Tunnel and Warringah Freeway Upgrade project and the Beaches Link and Gore Hill Freeway Connection project are being delivered as separate projects,*

but have been developed as an integrated program of works known as the Western Harbour Tunnel and Beaches Link program.”

The evaluation of different scenarios in the EIS includes options for “Do nothing”, “Do something” (the Beaches Link, but not Western Harbour Tunnel), and “Do something cumulative” (the Beaches Link tunnel and Western Harbour Tunnel). As stated in Chapter 3, and as the Western Harbour Tunnel has been approved, the “Do something” scenario (without WHT) is not relevant. The EIS process did not include evaluation of a scenario of Western Harbour Tunnel, but no Beaches Link.

This is the most realistic option, taking into account traffic movements to and from the Northern Beaches ending traffic congestion on the Warringah Freeway. Transport for NSW cannot claim the Beaches Link is a necessary piece of infrastructure without full evaluation of the option of Western Harbour Tunnel but not Beaches Link.

1. A condition of approval of the project must be the investigation and full evaluation of the option of a Western Harbour tunnel but not the Beaches Link and make that information and the modelling publicly available as an extension to this EIS. Currently costed at a conservative \$10B, will this be considered and when?

The EIS, Chapter 4 (page 4-12) states:

- *“without measures to improve journey times by increasing the road efficiency or capacity, the addition of more buses to the network can contribute to congestion.”*

1. What expert transport planner would reduce the options down to such a simplistic conclusion “more buses = more congestion”?

2. We know real consideration of public transport options was not considered prior to the commencement of the concept stage - as revealed in NSW government cabinet documents leaked to the media. This must be conducted via an independent cost-benefit analysis for all transport options and publicly released.

We also know that Transport for NSW has planned the further sell off of public transport bus routes now that it has sold Northern Beaches Route 8. We know that NO light rail or high speed rail alternatives have been costed or considered. By completion of this project, The Beaches Link will have become the problem we need to fix.

It will not be addressing any of the growth potential and challenges because it will have been superseded by its completion. To invest \$10B that historically will blow out to at least \$14B by completion, would be much better invested in genuine public transport alternatives

that promote cleaner mass transport but does not support the governments commitment to raising capital through tolls that are then sold.

The Secretary's requirement that the EIS must include:

- “ *the alternative tunnel design and ventilation options considered to meet the air quality criteria for the proposal*” has not been met in relation to the
- *‘justification for the preferred proposal’*.

This is due to lack of alternatives to no filtration on the ventilation stacks being supplied. There are no alternatives supplied.

I note that the EIS states:

- “ *The reduced use of tunnel ventilation fans also increases the performance of the tunnels and reduces operational power consumption, thereby reducing the operational costs of the project and enhancing the sustainability outcomes*”. (EIS 4-84)

The priority of operational costs must be viewed as the justification for exposing our community and my family to hazardous particulates smaller than PM2.5 and NO2, as any levels are unsafe. There is NO safe level. The sustainability outcomes are not the true reason for not running ventilation fans as if sustainability were a part of any of the planning of this major project it would have been looking at sustainable mass transit options, which it has not. Operational costs is the reason for no filtration and not gaining the local data to support filtration will lead to culpable human suffering and death.

5. PROJECT DESCRIPTION

I carry significant concern relating to localised, direct impact and environmental issues that present themselves in the Project Description.

I point to that the project description is inconsistent in its description of open space at Balgowlah.

Figure 5-5 provides an indicative concept of the upgraded open space at Balgowlah Park and no open space over the tunnel portal, whilst Figure 5-28 provides a more detailed schematic. They are not consistent.

There is no visual representation throughout the EIS that is an accurate schematic to show the actual proportions and visual impact of the ventilation stacks to scale.

1. I would request that to scale and accurate representations are presented to the community. As this has not been done, I would submit that the Secretary's requirement has not been met:

- that *the EIS must include:*
- *“design of the tunnels, interchanges (inclusive of tunnel portals and entry and exit ramps), road user, pedestrian and cyclist facilities, and lighting;*
- *ancillary infrastructure and operational facilities, such as operational and maintenance facilities, ventilation structure and systems, and fire and emergency services and infrastructure for the proposal*
- *the relationship and/or integration of the project with existing and proposed public and freight transport service;” (EIS 5-1, 5-2)*

5.1.3 Preparatory investigations and surveys

- *“The project does not include preliminary works, including surveys, test drilling, test excavations, geotechnical or contamination investigations or other tests, sampling or investigations carried out for the purposes of the reference design or assessment of the project.*
- *These works are currently permitted under separate existing approvals and/or are subject to separate assessment and determination in accordance with Environmental Planning and Assessment Act 1979. However, investigation and survey works would continue as part of further design development for the project following approval.” (EIS 5-7)*

1. Based on the above statement in your document, please inform me if it is correct that the contamination testing and surveying to specific impacted properties and bio-diversity will be carried out after the project is approved?
2. If they are found to be hazardous, what measures are in place to mitigate this damage and at what measures has the project deemed to not be beneficial to the community?
3. I would ask that this information was publicly available.

5.2.2 Alignment (EIS 5-17, 5-18)

- *“Vertical Alignment*
- *The top of the mainline tunnels would be:*
 - ***About 100 meters below ground at their deepest point beneath Northbridge***
 - ***Between 16 meters and 22 meters below the water surface of Middle Harbour***
 - ***About 75 meters below ground beneath Seaforth***
- *The mainline and ramp tunnels would rise to the ground surface at the tunnel portals within the Warringah Freeway, Gore Hill Freeway, Burnt Bridge Creek Debiation and the Wakehurst Parkway.”*

Reference Figure 5-10 Indicative vertical alignment of the mainline tunnels and the ramp tunnel connection to the Burnt Bridge Creek Deviation (EIS 5-19)

Figure 5-12 Indicative vertical alignment of the ramp tunnel connection to the Wakehurst Parkway (EIS 5-20)

It is of the highest concern to me personally that the above figure shows that the calculation of 75 meters below ground is taken from the road surface of Seaforth Crescent. It is stated as tunnelling 16 - 22 meters below the surface of Middle Harbour.

As our dwellings are on the foreshore on the Harbour on Seaforth Bluff, we are mere meters above the measured water line and again the figure is not indicative of the impact for houses not on the road surface level.

1. I would request again, and stress the importance that the measurements and impacts are taken from each of the impacted sensitive receivers and that communication is forthwith.

2. I would submit that the secretaries requirement that Community Consultation and Stakeholder Engagement has taken place, has not been met. I would request that this is rectified and the correct measurements are presented to the community stakeholders and sensitive receivers for community submissions and response as an extension of this EIS.

The figure below is particularly concerning when measuring proximity of tunnelling depth to our property.

Figure 5-14 Indicative long section of the immersed tube tunnels (Middle Harbour) (EIS 5-23)

5.2.3 Tunnels (EIS 5-21)

I would again submit that to construct what this states “ *The tunnels would provide* “ will create 6 tunnels under Seaforth that will each have tunnelling construction with the mainline tunnels under Middle Harbour as well.

Seaforth Crescent cannot handle the cars that are parked on it now. There is no acceptable parking solution offered in this EIS for residents or construction workers. Seaforth Crescent has been incredibly poorly maintained by Northern Beaches Council despite being one of the largest rate paying contributors in the entire LGA. The road itself is unable to handle its own traffic or the flooding that comes with poorly managed council drainage throughout the street. The impact of this construction is not feasible at all to handle the road support that will be required.

The EIS states the car parking for construction workers will be provided on site in Balgowlah, and workers would be encouraged to use public transport or shuttle buses. However,

experience on other similar projects has found that worker car parking is universally a problem, with large numbers of workers parking on local streets.

For example, the EIS Appendix F, Part 1 (page 176) states that despite removal of the golf club car park, “*alternative parking is available on Pickworth Avenue, impacts would be negligible*”. Locals know that Pickworth Ave parking is regularly full, particularly when Balgowlah Oval is being used. This adds to the pressure of parking in the local area. I can only imagine Seaforth Crescent.

1. Guarantees need to be provided to ensure workers are not permitted to park in local streets, without being reliant on council to enforce local parking restrictions.

5.2.4 Tunnel to tunnel connection (EIS 5-26)

Figure 5-15 Indicative cross section of the end sections of immersed tube tunnels (Middle Harbour) (EIS 5-24)

Figure 5 - 16 Indicative cross section of the middle sections of immersed tube tunnels (Middle Harbour) (EIS 5-24)

Figure 5-25 Indicative cross-section through the Wakehurst Parkway and ramp trough structure (EIS 5-39)

1. I would note that the above mentioned figures show no dedicated bus lane in the tunnel despite it being stated as being there. Each lane is a transit lane.
2. Is there a dedicated bus lane in the tunnel?
3. I would also refer to my earlier question as to whether Freight will be travelling in the tunnel and what are the height restrictions for public transport?

5.2.6 Surface Road Works

I echo the concerns of the Northern Beaches Council in relation to the surface road works in Seaforth:

ATTACHMENT 1

Response to Beaches Link Environment Impact Statement

Item NO 13.2 - 23 February 2021

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- Works and assets delivered along Wakehurst Parkway must be wholly contained within the Wakehurst Parkway road corridor and not take place or encumbered in any way Manly Warringah War Memorial State Park (Manly Dam)
- Manly Warringah War Memorial State Park has been mislabelled “Manly Dam Reserve” throughout the document

- There are substantial land clearing impacts (approx 15 ha)most of which are associated with the construction footprint along Wakehurst Parkway
- Increases in habitat fragmentation and indirect impacts to native vegetation adjoining the new Wakehurst Parkway
- Increases in habitat fragmentation and indirect impacts to native vegetation adjoining the new Wakehurst Parkway roadside edge

More than 15 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.

This includes Sydney Water site (Bantry Bay Reservoirs) at Kirkwood Avenue, as it cleared, “grubbed” and transformed into a construction site. This land was saved at the 11th hour by the community from being sold off to developers in 2015, and promised to return it intact to Manly Warringah War Memorial Park to compensate for the loss of rare bushland and biodiversity as a result of the Manly Vale Public School expansion. This promise has not been kept by the NSW government.

A Total Earth Care Biodiversity Study commissioned by Sydney Water in 2018 revealed that the diverse bushland on the site was home to many birds and animals - including the threatened and fragile Eastern Pygmy Possum. Another threatened species mentioned in their report was the Eastern Bent-wing bat - which was notably absent from the species listed in the Beaches Link EIS.

The NSW Government is promising to revegetate and return this area back to the park afterwards, but it is not possible to recreate the complex tapestry of endemic flora species or the lost wildlife. Disturbing and removing the original topsoil means opening up the whole area to invasive weed invasion. Locating an industrial grade work site here would be disastrous for the environment.

Polluted water will flow into Manly Dam from two sources. The wastewater treatment plant next to the water tanks that will be operated as part of the Seaforth Construction Site. Water from the Wastewater Treatment Plant and dirty run-of from the construction site will be channelled 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.

The widening of Wakehurst Parkway will result uncontrolled flows of water during periods of heavy rain. The ruts resulting from the construction activity on the ridges and slopes as part of the bush clearing and the construction activity will result in the flow of polluted water in the catchment area of Manly Dam and into Bantry Bay. In the EIS, the Transport for NSW even admits that it cannot control this happening when it rains heavily. For example, in 2020 this would have happened every month.

The likely loss of Water Quality in Manly Dam and its catchments is likely to wipe out the population of Gondwanan Climbing Galaxias fish in Curl Curl creek (Manly Creek) thought to have existed for 60 million years. They are the only population in Sydney. The impact assessment in the EIS determined that “*taxa (biodiversity) in these sections of the catchment are pollution tolerant*”. Nothing could be further from the truth!

In Northern Beaches Council’s draft EIS response (page 39) it says “its loss would represent a range contraction”. It also says “Council would have significant concerns about any decrease to water quality in Manly Creek”. This means that Manly Dam might have to be closed to all forms of human water recreation too.

Groundwater flows into the Burnt Bridge Creek will be reduced by around 80% while the tunnels are being built and up to 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), the grey-headed flying fox colony, 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.

The grey-headed flying fox colony are presumed not to be impacted by noise because they currently live next to a busy road. The EIS states that when noisy roadworks occur at night, the colony will be OK because most bats will be away from the colony foraging. This ignores the fact that juveniles are left behind while their mothers forage at night, and will be exposed to this increased noise. An expert in the animals’ behaviours will be employed to assess impacts on the colony, but this is of unknown regularity or time of assessment.

1. I would ask for publicly available and best practice implementations for better control measures, systems to monitor pollution levels (and if they rise, mechanisms to find and stop the source of pollution) and guarantees that waterways do not become polluted.

I reiterate that I, and my family have personally financially invested immeasurable amounts in purchasing and not developing land throughout Seaforth with the sole purpose of preserving the native corridors for habitat trees and native fauna. To see the State Government

with partial endorsement from Northern Beaches Council endorse the clearing of irreplaceable bush lands unique to our area and housing several endangered species is of extreme personal concern to me.

I have invested to prevent this happening and would expect that the government could at least, protect our native and endangered species as once it is gone it is gone. There is no amount of regeneration that will bring species back.

Any species reintroduced or that manages to survive 7 years of chaos, construction, noise and vibration, will be left to suffer through breathing in unfiltered toxic particulates from unfiltered ventilation stacks causing certain suffering that has been considered as an acceptable level of consequence in this report. I strongly object to that.

The business case does not justify any of this risk.

5.2.12 Landscape Treatments (EIS 5-49)

Landscape Treatments for the project would be consistent with the project urban design framework in Appendix V (Technical Working Paper : Urban design, landscape character and visual impact assessment).

Landscape treatments would be designed and implemented with the aims of:

- *Minimising the visual and landscape impacts of the project*
- *Integrating the project into the surrounding visual catchment*
- *Improving local and regional amenity*
- *Maximising the use of endemic species, including consideration of current and future climate conditions.*
- *Providing opportunity for improvements in urban ecology*

1. I would submit that the visual impact has been misrepresented throughout the document and therefore the Secretaries requirements aforementioned have not been met in the EIS.

6. CONSTRUCTION WORK

6.1 Overview of Construction Work

Reference Figure 6-1 Overview of temporary construction support sites for the project (EIS 6-3)

1. In the above figure, I ask how far from our listed properties you have measured

“Middle Harbour north cofferdam” Identified as (BL8)

Table 6-2 Overview of construction works (EIS 6-4 , 6-5)

- *“Early works and site establishment:*
- *Temporary relocation of swing moorings, where required*
- *Provision of alternative facilities (swing mooring or marina berth) for users, where required*
- *Installation of site fencing, environmental controls and traffic management controls*
- *Vegetation clearing, earthworks and demolition of structure”*

1. I would query as to the timing of the requests to lease waterways related to our boat moorings and structures on the foreshore received from Holding Redlich we have received in recent weeks. As this has recently been privatised, I would question any leases or arrangements to be made based on the vague nature of the assessment on construction impacts in the EIS.

I am concerned about every listed *“typical activity”* in the Construction of the Beaches Link component in Table 6-2. I am extremely concerned for the personal impact and the irreversible impact on our waterways and precious Harbour.

6.3.1 Early Works, preparatory investigations and Surveys (EIS 6-6, 6-7)

The EIS states that early works would include but are not limited to:

- *“ Survey work and investigations including investigative drilling “ , “ further contamination testing and land remediation subject to the recommendations of a remedial action plan (where required) “ and*
- *“ Provision of alternative facilities (swing mooring or marina berth) for the users of a small number of fixed jetties below Seaforth Bluff that would have access restricted during construction”.*

In the above repeated order of response I submit the following questions:

1. Have the survey work, investigative drilling and contamination testing resulted in a remedial action plan being activated in relation to the toxic plumes found in Sydney Harbour?

1. If so, I would ask to have those results made publicly available as an extension of this EIS with the community response and submissions applied to sensitive receivers, being all residents across the foreshore of Middle Harbour Seaforth, Northbridge and Clontarf.

2. If not, I would ask why not and what are the measures to trigger said remedial action plans?

2. In reference to the small number of fixed jetties referred to in Chapter 8 of the EIS, (Construction traffic and transport) I ask what measures are in place to protect said re-

ceivers from Toxic Plumes and what reimbursement will be applied for leased water access if it is no longer managed by NSW government and has been indeed outsourced?

I express my grave concerns regarding the Toxic Sediment and Sludge from the Cofferdams and the Installation of the Immersed Tubes in Middle Harbour. The disturbance of sludge on the bottom of Middle Harbour (in fact at one of the deepest parts of Sydney Harbour) presents a major problem for communities that spend time in Middle Harbour, Spit Marina, Sandy Bay and Clontarf Beach and Children's Ocean Pool.

The tide will carry the sludge towards Spit Bridge and beyond – with potentially high levels of very nasty toxins in the waters of Sandy Bay and in the Clontarf Ocean Pool.

The control of sediment, silt and sludge by means of floating curtains around the construction site in Middle Harbour is a serious challenge – and the contractor will not be able to provide a guarantee that the levels of toxins in the waters of Sandy Bay and Clontarf Beach will be within safe levels.

I believe that the risks for the community are unacceptable.

3. I will directly be subject to excess noise and vibration from the construction of the project, including potential damage to homes. The EIS provides no exact information on the mitigation measures that will be put in place to prevent this. There are no adequate protections laid out in the EIS and all of the impacted community including my family and residents of my 6 properties should be entitled to know as a condition of approving the project.

The recent parliamentary inquiry into the construction of WestConnex Stage 1 and 2 found many examples of contractor breaches of the rules, relying upon resident reporting and complaints.

They report Finding 14 *“That the various noise mitigation measures offered by Roads and Maritime Services are wholly inadequate to substantially reduce heavy construction noise.”*

1. What are the protections to ensure my family does not suffer the same fate? Are they sufficient? What are they not laid out within the EIS.

Many thousands of residents will be subject to excess noise and vibration from the construction of the project, including potential damage to homes. The EIS provides no exact information on the mitigation measures that will be put in place to prevent this.

Figure 6-26 Overview of construction activities and construction footprint (map 4) (EIS 6-43) &

Figure 6-36 Indicative Layout - Middle Harbour cofferdams (BL7 and BL8) (EIS 6-65)

1. I would ask that all residences that are visible on those maps in relation to **BL8** are directly considered sensitive receivers to the construction impacts and individual stakeholders and communicated with accordingly.

Table 6-35 Proposed Construction hours (EIS 6 - 84)

I am extremely concerned about the direct impact of the Tunnelling, tunnelling support and underground activities.

- *“ Tunnelling using road headers would occur 24 hours per day, seven days a week, due to each excavation cycle taking around 8 - 10 hours”.*

1. This will require continuous ground support on local roads. Having had no direct communication I would ask how this will be mitigated, and what measures are in place.

Table 6 - 37 Middle Harbour crossing - works outside standard construction hours (EIS 6 - 89)

1. What measures are in place to mitigate the direct impact from years of continuous pump operation within distance of our homes?

Table 6 - 40 Marine Based construction vessel movements (EIS 6 - 94)

Based on this table, there will 55 barge movements per day each way and 12 small boats transporting construction work force. That means we have 110 barge movements per day or **one barge movement every 13 minutes** if it were a 24 hour movement. Based on the tunnelling being 24 hours that is assumed.

1. How will the impact of this be measured and mitigated to those of us personally effected?

2. How has this impact been modelled?

3. Standard construction hours will be 7am-6pm weekdays and 8am-1pm Saturdays, with night work conducted “when required”. I would request to be informed with the full list of conditions that determine when night work can be conducted, and not to be left to the discretion of the contractor at the time. This should include any construction activities within the site boundaries.

Bearing in mind the increasing number of people working from home, and construction sites proximity to schools, there are many more people near construction sites during the day. Consideration should be given to restrict types of work within standard construction hours – ensuring loud activities are conducted only at appropriate times when school students are absent, and daily respite times to noise, vibration and truck movements (beyond minimising truck movements during peak traffic times). These restrictions should be developed from real consultation with the community, not determined by the contractors.

Truck movements. The EIS does not detail a lot about the directions that trucks will move once they have left construction sites. In many circumstances, the trucks will travel in the direction tunnel spoil needs to go, and could be in north, west, or south Sydney. There are no guarantees that tunnel spoil trucks will not travel on local roads in great numbers. One such example is Frenchs Forest Rd, Seaforth, where the gradient and curve in the road makes it a dangerous section for pedestrians and other road users.

1. Restrictions must be placed on the volume and timings of truck movements carrying spoil that ensures local streets are not impacted

7. STAKEHOLDER & COMMUNITY ENGAGEMENT

Table 7-1 Secretaries environmental assessment requirements - Stakeholder and Community Engagement (EIS 7-1)

- *“Consultation:*
 - *The project must be informed by consultation, including with with affected landowners, business and the community.”*
 - *“Stakeholders were identified through consideration of the projects direct and indirect impacts and from records of previous correspondence with relevant government bodies, business groups and community groups. Engagement has included ongoing liaison and consultation with the following Stakeholder groups:*
 - *Property owners and residents along and near the alignment*
 - *Marine stakeholders and waterway users”*

I dispute the above assessment found in 7.1.3 Stakeholders (EIS 7-5)

1. I would submit that we were sensitive receivers in terms or proximity to the unfiltered smoke stacks. I would submit that we are sensitive receivers in terms of direct impacts of construction noise and vibrations, construction traffic impacts, property damage and exposure to harmful pollutants, particulate matter and toxic plumes throughout the construction. As such, I would submit that we were not identified as relevant stakeholders or communicated with appropriately and there for the obligations of this EIS have not been met.

It is detailed that there was community consultation from 2018 with 232 expressing dissatisfaction with the community consultation process, 184 submissions supporting the project, and 2243 opposing.

I am aware of several approaches to Transport for NSW describing the issues the community has had in accessing the EIS online, and limited opportunities to have questions answered. Requests for face-to-face sessions in small settings adhering to COVID-safe practices were rejected, as were requests for an extension to the EIS submission period.

During a recent Transport for NSW Virtual Information Session, a method advertised as a way to have community questions answered, only 43% of questions received any response – with many of those being limited in detail, either saying “we may speak about that issue later in the session” or just referring to a chapter in the EIS.

Community consultation has been inadequate for the purposes of the EIS process. It should not be up to Transport for NSW to assess their own performance, but an independent assessment speaking to all stakeholders and the community.

1. I would submit that an independent assessment is conducted and resubmitted to the EIS and community for response and submission.
2. I would also request the Community Communication Strategy discussed in this chapter is made public and resubmitted as part of the EIS.

8. CONSTRUCTION TRAFFIC AND TRANSPORT

8.3.4 Northbridge to Seaforth (Middle Harbour crossing) (EIS 8-18)

I would refer to this chapter, that identifies us on our properties directly as “marine stakeholders and waterway users’ along with being and in Navigation restrictions (EIS 8 - 22) and therefor the minimum requirements for consultation with stakeholders has not been met.

Figure 8-6 Existing maritime facilities in Middle Harbour near the project (EIS 8-23)

1. I refer to the Community groups and clubs Number 5, Seaforth Sailing Club and query how they have been identified as a stakeholder or potential community receiver in this document warranting note of being near the project. Our properties proximity to the project in Middle Harbour is much less and therefor would query again, what measures are in place to mitigate the impacts of construction traffic and transport on us bordering the waterways and on the grounds as we are direct recipients of the impact more so than some maritime facilities marked in the above diagram.

8.4.3 Impacts on swung moorings and marina berths (EIS 8 - 52)

- *“These moorings would be relocated for about 48 months, and likely just to the west of their existing locations in Middle Harbour, in consultation with the lease holders and therefore impacts on boat users due to the displaced moorings is considered to be minor.”*

1. I would ask whether consultation with all lease holders to be impacted by the construction proximity to **BL8** and the toxic plumes will be taking place? If so, when? If it has been conducted, why were we not consulted in the request for lease negotiations? If not, I would submit that again, the Stakeholder and Community Engagement requirements of the secretary have not been met for their EIS.

9. OPERATIONAL TRAFFIC AND TRANSPORT

I would refer to my earlier comments regarding the lack of a business case for the tunnel and the inaccuracies of the transport data. I would submit that the modelling is not correct and does not forecast accurately therefore the cost benefit analysis is wrong and the data included in this chapter is incorrectly in support of a failed business case for a tunnel.

1. I would submit that the Secretary's environmental assessment requirements Objectives 2a, 2c, and 2f have not been met in this EIS. (EIS 9-1, 9-2).

2. I would ask what measures are being put in place to prevent rat runs for toll avoidance through narrow streets that rely on on street parking throughout, like Seaforth Crescent. I would ask that it be marked for residential traffic once the Beaches Link is operational. (If not throughout construction)

Referring to all operational traffic and transport affecting Seaforth and surrounds, I would also concur with the request and recommendations in the Northern Beaches Council - Response to Beaches Link Environment Statement Draft Submission, Item No 13.2 - 23 February 2021 Attachment 1, Pages 14 - 19 ; Operational Traffic and Transport (Page 561 - 566 of minutes).

10. CONSTRUCTION NOISE AND VIBRATION

Figure 10-4 Noise catchment areas and monitoring locations (map 3) (EIS 10-9)

In the above figure, our properties on Seaforth Crescent are identified in Noise Catchment Area **NCA 39.2**. I note that there is Noise monitoring locations in NCA 42.1 (L31) and NCA 39.1 (L27). As a residential receiver, I would request that there is noise monitoring station in our Catchment area NCA 39.2 as well as the modelling used to select these locations has not considered the noise that also carries across the water which will give us double the impact on for foreshore of Middle Harbour at our addresses.

10.3.3 Construction noise and vibration assessment (EIS 10-11)

• “ *The construction noise and vibration assessment for the project considered the potential impacts associated with airborne noise, ground-borne noise and vibration, and included the following key steps:*

- *Identification of potentially affected noise and vibration sensitive receivers for each construction area and temporary construction site*
- *Determination of noise and vibration objectives for residential receivers*
- *Prediction of construction airborne noise, ground borne noise, construction traffic noise and vibration impacts for the identified construction stages/scenarios"*

1. I would submit that this assessment has not been completed as we have not been communicated with not have the measures been taken from our waterfront properties. Again the references refer to Seaforth Crescent at road level and there is no noise monitoring noted in our catchment. I would request the accurate data is supplied to those sensitive receivers such as ourselves that have not been communicated directly with. I would submit that there is difficulty of finding information relevant to our own properties throughout the 11,000 pages of the EIS and therefor again the obligations of community and stakeholder engagement have not been met. Reflected again throughout this chapter.

10.4.1 Airborne Noise - Residential receivers (EIS 10-12)

- *"There is also a highly Noise affected level for construction, above which further mitigation needs to be considered, such as additional consultation and notification, additional respite periods and alternative accomodation"*

Sleep disturbance criterion & Definition of 'feasible and reasonable' (EIS 10-14)

The EIS Chapter 10 (page 10-12 to 14) talks about "*reasonable and feasible*" noise mitigation - based on the Noise Policy for Industry (NSW EPA, 2017a). Whilst the need, likely benefit, social and environmental effects are all considered when evaluating whether a particular noise mitigation should be used, so is cost.

1. I would ask for the definition of feasible and reasonable to be given quantifiable measures and be informed of what the monitoring guidelines and requirements of reporting and timely responses and mitigation will be.

The methods used to mitigate construction noise (such as noise walls) are not fully dealt with in the EIS - they just say they will arrange mitigation later. The community should have more information and confidence in these strategies, rather than just being told "we'll sort it out later".

1. I would ask who decides whether something is too expensive to implement? I would request that decisions such as these need to be made by an independent arbitrator who consults with all parties including the residential receiver and the community, not just Transport for NSW or the contractor.

2. As a condition of approval of the project, an independent assessment of noise and vibration impacts from construction on all surrounding homes with noise and vibration above management levels must be done and provided to property owners before construction commences. Where exceedances are found to be likely, appropriate mitigation strategies such as double-glazing or noise barriers to eliminate these exceedances must be implemented before construction. Where exceedances cannot be eliminated, negotiation between the resident and Transport for NSW must be undertaken and if an agreement cannot be found, alternative construction methods must be undertaken.

3. Numerous examples can be provided on similar projects of contractors breaking restrictions during construction, and it relies on residents to report these breaches. It is too much to expect residents to monitor worksites – Transport for NSW must be responsible for monitoring contractor compliance, with appropriate penalties for breaches.

Table 10-6 Recommended minimum working distance for vibration intensive plant equipment (EIS 10 - 16 , 10-17)

1. I ask how human response impacts will be measured and mitigated in relation to vibratory rollers and Impact piling hammers. I would also ask if all properties identified as receivers based on this table have been contacted and consulted regarding prevention and mitigation measures. If not, the requirements of the EIS have not been met.

Table 10-9 Number of receiver buildings exceeding construction vibration screening criteria from mainline tunnel construction : Seaforth (EIS 10-28)

1. Whilst this chart identifies 440 total buildings with screening level above the risk of human comfort as a result of road headers and Rock hammers, this chapter actually represent up to 531 residential receivers that could be exposed to ground-borne noise levels above 45 db(A). There are 318 properties identified in Seaforth alone. I have great concerns regarding the additional mitigation measures that will be required for these properties and how that will be managed. I am concerned for our properties specifically and query how they have been graded and considered and would request that information to be communicated and to be consulted further regarding the impact on our family, residents, our native flora and properties.

Table 10-7 Background and ambient traffic noise monitoring ; Seaforth (EIS 10-21)

1. I again refer to the lack of monitoring at the residential receivers on the foreshore such as our properties.

2. I do not agree that the mitigation measures are clearly defined in this chapter as referred to throughout the document.

Table 10-36 Environmental Management Measures - construction noise and vibration
(EIS 10-90 to 10-96)

1. I would request that every receiver is communicated with regarding all mitigation measures and options for the environmental management and that the onus to measure and mitigate or report is not solely on the receiver. I would refer again to the business case of the tunnel when the greatest exposure to construction fatigue, noise and vibration impacts, environmental marine impacts and direct health impacts of the unfiltered smoke stacks rests so clearly on the residents of Seaforth when the benefit is clearly not ours. How will you cost mitigating these issues that are scheduled to last years?

11. OPERATIONAL NOISE AND VIBRATION

Figure 11-2 Receiver buildings eligible for consideration of additional noise mitigation
(map 2)

1. I submit that we are located in **NCA 39.2** and are eligible for consideration of additional noise mitigation.

Figure 11-9 Number of receivers considered for at-property treatment (EIS 11-16)

2. I would note again that the noise catchment area referred to for Seaforth is 53.1 with a total of 11 receiver buildings. I ask that this is reassessed following Noise monitoring stations being installed in each noise catchment area across Seaforth.

3. I would also agree with the Northern Beaches Council recommendation as found in Response to Beaches Link Environment Impact Statement as earlier referred to as a draft from the meeting on 23 February 2021, Page 20,21) represented as pages 567 and 568 in the minutes.

12. AIR QUALITY

12.3.3 Ambient air quality criteria (EIS 12-14) & Appendix H (Technical Working Paper: Air Quality) & Annexure B of that report.

The justification not to install filtration is spread over thousands of pages of very technical information throughout this EIS.

To summarise the justification; In the view of the medical experts (through the NSW Chief Medical Officer and the technical experts on air flow from ventilation stacks) there will definitely be an increase in the level of air toxins in the atmosphere close to the stacks (1.2 km and below), but the “modelling” tells the experts that not enough people will die as a result of the increase in air toxins to justify the expenditure on filtration to justify the additional expense on installing filtration in order to reduce those additional deaths.

I do not accept this as a general premise as there is no safe level of exposure, our properties are within 1.2 kms of both unfiltered ventilation stacks and are therefor even further ex-

posed. I do not accept that our human health and suffering is not valued enough for the expense of filtration.

Throughout the document, we are referred to Stockholm, London and other global cities for their expert data in tunnel construction. Why is it that every referred to location throughout the document utilises filtration on their ventilation stacks and yet that is the one part of experience and expertise that Transport for NSW has chosen is not financially viable as stated at the beginning of this submission as the deciding motivator for the certain culpable human suffering and death that will be experienced by the community and most certainly my family at my properties.

Table 12-4 Ambient air quality criteria applied to the assessment of the project (EIS 12-14, 12-15)

There are flaws with the modelling as it is based on averaged figures across large time periods (i.e. 24 hours) and insufficient emphasis placed on the exposure peaks when traffic is travelling in the relevant direction.

For example, the shortest exposure period modelled for PM10 is 24 hours – combining late night periods of low traffic with peak periods.

Ultimately, the tunnel project will increase levels of a variety of pollutants for schools and residents - for which there is no safe level of exposure according to health experts and i dispute the EIS stating that it is safe.

Figure 12-4 Construction dust screening assessment - receivers near the construction footprint (EIS 12-20)

1. I would note that our properties are within Zone 3 as identified in the above figure and would be eligible for dust screening assessment and would expect consultation on this to be directly with our household. EIS 12-21 details Zone 3 and i would argue that the measures for mitigation of the acknowledged human health impacts be integral as a condition of approval of this project.
2. I note that Zone 5 should consider the dust screening assessment in terms of the impact on the local, native and endangered Flora and Fauna.
3. EIS 12-22 refers to the Risks of dust impacts and again identifies us as receivers of Human health impact, settlement and ecological impacts and we would request information on how this will be measured and mitigated as part of the approval considerations and a condition of approval for this project.

We would agree with Northern Beaches council in requesting that the proponent undertakes further data collection on ambient vehicle emissions around the local catchments prior to, during and after construction to allow for a robust assessment of the approved ventilation systems and allow the operator to provide additional filtration measures WHEN the need arises.

I would refer to the map in Appendix V page 181 (11). The map shows the impacts of the unfiltered smoke stacks and the spread of plumes and particulate matter to homes surrounding the Seaforth exhaust stack which, due to the exhaust stack's location on the top of a ridge, covers the far greater areas of Seaforth, North Balgowlah, Killarney Heights, Allambie Heights and Castle Cove.

The impacted areas are shown in pink, and are important because many residences have not been informed directly by Transport for NSW of impacts or community consultation.

That includes our properties which are in a high impact zone according to the NSW Chief Scientist and the documents in your EIS.

13. HUMAN HEALTH

The management of human health impacts of the proposed tunnel project and our responses to the direct impact on our human health as direct sensitive residential receivers on multiple levels is unacceptable.

That said, I would submit that Secretary's environmental assessment requirements - human health (EIS 13-1, 13-2) as represented in Table 13 -1 have not been met as required in this EIS. I would refer in particular to the Secretaries requirements for 1. Health and Safety (in full) and 2. Air Quality in full.

1. It is my view that until said obligations and requirements of the EIS are met, by full assessment and consultation with all receivers including us (who have not been consulted with despite being identified as recipients of human health impacts throughout the entire construction and within 1.2 kms of both unfiltered ventilation stacks doubling our exposure to human health impacts post construction when operation commences) and measures for mitigation of human health impacts are communicated and put in place, the project cannot be approved as it has not met its minimum requirements.

Consideration of approval must be contingent on the Human Health requirements being met including full modelling and costing of the human health impacts for not having filtration on the ventilation.

13.5 Assessment of potential operational impacts (EIS 13-15, 13-16)

1. I submit that the assessment that there would be no significant impact to human health as a result of the operation of the ventilation stacks is completely untrue. It is not accurate. It is not reflective of the global data and is a position that is clearly taken as a cost saving measure at the cost of human suffering. I do not accept these findings and do not find the assessments transparent so again submit that this EIS has not met its requirements

or objectives and therefore the content for the project to be approved would involve filtration on the ventilation stacks and modelling and assessment done for all receivers identified.

I am very concerned at the extended period of time that we will be exposed to all of the health hazards and construction fatigue and do not see any tangible measures in this EIS to combat or mitigate that.

14. NON-ABORIGINAL HERITAGE

Middle Harbour (EIS 14-6, 14-7)

14.4.2 Potential Terrestrial heritage impacts (EIS 14-8, 14-9)

Table 14-3 Potential impacts on terrestrial heritage items Item 9 - Harbour Foreshores

Figure 14-3 Location of maritime heritage items impacted by the project (EIS 14-34)

1. As the harbour foreshore where our properties are is specifically reference with local heritage significance, I would ask that all mitigation measured against the Toxic Plumes and to protect the harbour foreshore are communicated directly to the community and residential stakeholders prior to consent of approval for the project.

2. I express additional concerns regarding the measures to protect the Historic Stone Library and former school house in Seaforth identified in Figure 14-2 Location of terrestrial heritage items impacted by the project (EIS 14-26) and would ask that they are communicated as above and identified prior to consent of approval for the project.

The other areas of concern that I have addressed in other parts of this submission are the Manly Dam and surrounding conservation.

I would also support and agree with all the recommendations of the Northern Beaches Councils Draft Submission previously referred to throughout this submission and found on pages 22 to 25 of the draft document from 23 February 2021. (This is pages 569 - 572 in the minutes).

15. ABORIGINAL HERITAGE

Table 15-1 Secretary's environmental assessment requirements - Aboriginal heritage (EIS 15-1 , 15-2)

1. I submit that the secretary's requirements have not been met in the EIS in the most fundamental way. According to the referred to table above,

• *" The proponent must identify and assess any direct and/or indirect (including cumulative and visual impact) to the heritage items inclusive of:*

a. Aboriginal places and objects, as defined under the National Parks and Wildlife Act 1974 and in accordance with the principles and methods of assessment identified in the current guidelines;

....."

As two sites, a rock engraving (WILL-081, AHIMS#45-6-0271) and a rock shelter with art (WILL-055, AHIMS345-6-2111) also at Clive3 Park, Northbridge, are not included in the EIS (they are mentioned in Appendix L but stated incorrectly as being outside the study area).

1. Therefor, the minimum requirements of the secretary have not been met with this EIS. I would submit that there are many discrepancies in this chapter and that is reflective of the care that has been taken by Transport for NSW for protecting Aboriginal Heritage sites.

2. I would request data on the number of Aboriginal sites that have been misplaced or compromised in construction of all other tunnelling projects by Transport for NSW and how many have been inspected assed and recorded throughout the process. I would suggest that this is a minimum requirement to prepare mitigation measures for protecting these irreplaceable historic sites throughout our once pristine area.

3. If this cannot be presented to the public and the community it's then the appropriate assessments have not been carried out to date and would require further assessments prior to the approval of this project.

I support the general position of the Northern Beaches Council ion relation to the preservation of the Aboriginal cultural heritage.

CONCLUSION

I restate again that I am opposed to The Beaches Link Major Project and the business case for it. I submit that the requirements of the Secretary have not been met as evidenced in my submission, in this EIS.

I restate that i require direct and clear communication moving forward.

The current recipients of the impacts are listed below as sensitive receivers that should be considered in communication in addition to myself:

[REDACTED]