

I strongly object to the proposed Beaches Link Tunnel ("BLT").

The proposed project has been inadequately studied and modelled, and misrepresents the supposed benefits of increased road capacity.

The billions of dollars proposed to be spent on the project have been sold to a poorly-informed public as a near term fix for traffic congestion, which some residents and taxpayers misinterpret as a nearly immediate solution to the problem.

Instead, the project will involve many years of increased congestion as a result of the impact of construction, and in the longer term offers only an illusory solution to the longer term traffic problem: the work undertaken by TfNSW erroneously dismisses the impact of induced demand on traffic, which will see both the BLT and existing surface roads become congested in the short term post completion, in exactly the same way every other road project fails to successfully address congestion.

In order to achieve its dubious claims, the BLT will massively disrupt the lives of local residents, and will have significant and unacceptable longer term consequences. In the short term, construction noise and pollution will have a significantly negative impact on quality of life, and local residents will be asked to put up with not being able to navigate their own neighbourhoods as a result of the congestion on local roads during the construction period. Local residents and visitors will suffer from the loss of use of such popular locations as Clontarf Beach, or risk adverse effects to their health from continuing to use them.

Longer term, apart from failing in its sole purpose of addressing traffic congestion, the project will lead to irreparable damage to the environment and the health and wellbeing of local residents, as well as the safety of local children whose schools lie in proximity to the project.

The project is fundamentally flawed and poorly designed. It will ruin whole neighbourhoods in the Northern Beaches at vast expense, for minimal travel time savings. Furthermore, the NSW Government can't justify the immense project expense based on traffic projections - and if they could they either (a) are not telling the people of the Northern Beaches about what they intend to do to massively build out the population to generate traffic growth and even then (b) the tunnel would be inadequate if we continue to focus on private road transport as the solution.

1. Impact on Road Safety

The EIS explicitly states (page xi, Appendix F, Traffic and Transport) that the BLT would "increase localised traffic demand at either ends of the project" but goes on to blithely state that the project would be "integrated with the existing transport network." The "existing transport network" involves a number of small, residential roads in a low density suburb which is wholly unsuited to taking the burden of additional induced traffic. Furthermore, many of these local roads (for example, Wanganella Street, Maretimo Street, Seaview Street, Griffiths Street) are home to local primary and secondary schools (as well as day care facilities), and airily

dismissing the increased local traffic is to dismiss the obvious, negative impact on the safety of schoolchildren getting to and from school.

The community consultation sessions repeatedly dismissed suggestions the problem of increase rat-running on smaller residential roads, suggesting that the “modelling” undertaken suggested that traffic levels on local roads would decrease. This is plainly nonsense. Local residents will tell you that rat-running is already a problem on local roads and this can only increase during and post construction.

2. Impact of Construction on Local Residents

TfNSW has decided to site the Balgowlah Golf Course construction site bang in the middle of an area of low-to-medium density residential housing. The construction noise and vibration impacts set out in Appendix G clearly demonstrate an unacceptably large number of local residents home lives being impacted by high levels of construction noise both during “standard” construction hours and, in many cases, 24 hours a day, 7 days a week for periods of years.

The EIS grossly misrepresents the construction timeline, suggesting impacts lasting only four or five years. This is clearly unrealistic: the vastly simpler Warringah Road underpass was started in late 2016 and was only fully completed in March 2020. Vastly fewer homes were directly impacted, but residents of the Northern Beaches will vividly remember the monumental travel delays caused by the project.

At the Balgowlah Gold Course construction site alone, there will be a heavy vehicle movement every 80 seconds. To suggest that this will not materially impact travel for residents of the Northern Beaches - let alone local residents - is misleading.

TfNSW needs to come clean with HONEST descriptions of the impact of construction and construction traffic on residents of Balgowlah, Seaforth, North Balgowlah, Manly Vale and surrounding suburbs, rather than the pro-project massaged presentations to date.

3. Impact on Children’s Health

In addition to the comments above relating to road safety, I object to the casual dismissal by TfNSW and NSW Chief Scientist and Engineer of the questions around the impact of the BLT on air quality. Chapter 12 of the EIS (p53) references a “review” of “lessons learnt from other major road tunnel projects in NSW” which concluded that tunnel emissions have “little, if any” impact on surrounding communities. Firstly, a “review of lessons learnt” does not amount to an actual study of a matter of medical science. Secondly, to limit the review to tunnel projects in NSW condemns the NSW Government and TfNSW to simply repeat local mistakes, rather than learn from lessons experienced elsewhere in the world... or even Victoria(!). It is ludicrous to suggest that concentrating ALL of the traffic emissions between Balgowlah/Seaforth and Cammeray in the planned emissions stacks is not going to have a greater impact than the existing road traffic dispersed across a much greater area.

Crucially, the planned emissions stacks in the Balgowlah/Seaforth area are located within close proximity of a large number of primary and secondary schools. Children at Seaforth Public, St Cecilia’s Primary, Manly West Public and Balgowlah

Boys are within no more than 500m of the proposed stacks. In the UK, a Coroner was recently willing to find that the death of a 9-year-old girl was directly linked to air pollution. TfNSW is gambling with the lives of children in NSW for the sake of a 10% traffic reduction for residents in Mosman, and mere minutes (claimed to be) shaved off travel times.

Local residents will also be impacted by the ongoing impact of the emissions stacks in their own homes. Appendix V p135 clearly demonstrates that the stacks will be visible to large tracts of Balgowlah, North Balgowlah and Seaforth. Given the topography, there is no question that the residents of these areas will living within the plume of emissions from the stacks. The EIS has misrepresented the impact on the health and wellbeing of local residents.

Finally, Balgowlah Boys - a wonderful success story and resource for residents of the Northern Beaches - is in point blank range of the proposed Balgowlah Golf Course construction site. Despite this, it has been deliberately omitted from aspects of the EIS. This excellent school is amongst the most heavily impacted by the BLT and the impact of construction noise and pollution on the students will adversely impact the education and health of thousands of boys over the proposed construction period.

The NSW Government needs to reconsider the location of the exhaust stacks as well as the filtration of those stacks.

4. Dubious Traffic Projections

The BLT EIS claims that traffic will reduce on Spit Road, Military Road, Warringah Road, Eastern Valley Way and Mona Vale Road, **but with the projected traffic growth overall, this implies significantly higher traffic in and around the tunnel entrances. In Balgowlah, this implies a massive rise in what is currently a low -to-medium density residential area.** Balgowlah bears the brunt of construction disruption and increased congestion, as well as this rise in post-completion traffic, but for all this, the BLT **only delivers a modelled 10% reduction in traffic for Military Road.** Even if the BLT is really just a cynical “Mosman by-pass” benefitting the good people of Mosman, it doesn’t actually achieve its stated objective.

The traffic projections rely on vague assertions of “network capacity improvements” resulting from the BLT which have not been quantified and are not credible based on actual performance of other toll road projects across NSW.

Further, there is no evidence of TfNSW having fully accounted for traffic mix in its modelling. Heavy goods vehicles and buses will materially impact traffic speed and flow given the grades they would need to negotiate entering and leaving the tunnels. This has not informed the current design: there should be separate lanes for slower vehicles. If the design assumes heavy goods vehicles and buses are to use existing surface roads, then TfNSW is guilty of misrepresenting the project to the detriment of not only local residents, but residents along the Military Road corridor, who will continue to endure all heavy vehicle traffic: hardly the “Mosman bypass” that Felicity Wilson would have her electorate believe.

TfNSW also plays down the importance of induced demand in its modelling, suggesting the Sydney Motorway Planning Model forecast only a 0.3% increase to

2037 in traffic associated with induced demand (Chapter 9, p7). This is scarcely credible assumption based on real-world observation, as well as academic study, and calls into question the economic assumptions TfNSW is using. If the underlying modelling is flawed, then (1) the basis of the environmental impact statement is incorrect, and should be reassessed and (2) the basis on which this project will be assessed from an economic standpoint is also fundamentally flawed.

The NSW Government should be required to revisit the modelling underpinning this project before committing more taxpayer dollars to further project study, let alone project development.

5. Pollution of Waterways

Appendix Q (pp50-51) of the BLT EIS clearly states that the proposed construction poses clear risks to water quality in Middle Harbour, including increased turbidity, mobilisation of contaminated sediment and pollution from discharges, runoffs, spills and leaks. The sampling work referenced in Appendix Q notes that Middle Harbour' shallower sediments contain "above guideline" levels of a variety of contaminants including pesticides and heavy metals.

Clontarf Beach is a highly popular swimming and waterspouts destination, not just for local residents of the Northern Beaches, but also from a wide variety of visitors who cross the Spit Bridge with their families to enjoy this wonderful location. The proposed project clearly poses a threat to this environment, and its enjoyment by locals and visitors alike, throughout the construction period, and for years thereafter.

6. Loss of Green Space

It is not necessary to state the blindingly obvious: that the construction sites at Balgowlah Golf Course and Seaforth will take current green spaces, and turn them into giant dustbowls of construction activity in the middle of currently quiet residential areas. The project makes claims of returning "90%" of the construction site to green space, but this is presentation sleight of hand. The reality is that local children will lose their recreational and sporting space in Balgowlah for the majority of their childhood or teenage years during construction. Thereafter, the current green space is divided by a four lane access road and car parking facilities, and blighted by the combination of that four lane access road down the middle, the 12-lane widened Burnt Bridge Creek Deviation on one side, and the giant exhaust stack. Hardly a conducive outdoor space for recreation or sporting activity, and clearly a cynical misrepresentation.

The truth is that the BLT proposes to take public green spaces in order to double the width of the Burnt Bridge Creek Deviation, add a four lane road where none exists, and concentrate the entire Balgowlah-Cammeray traffic fumes in one spot thanks to the exhaust stacks.

7. Failure to Consult

It is disgraceful that the NSW Government, and TfNSW considers dropping a 29 Chapter, 25 Appendix (some of which are in multiple parts) EIS on the public as adequate “consultation.”

It is nigh on impossible for residents to absorb the detail, consider if and how they affected, and then respond given how the requisite information is buried deep in the document. Furthermore, for residents to be able to form a reasonable assessment of the impact of this project on their families and homes requires them to cross-reference data split between the various chapters and appendices. A prime example is assessing the projected noise impacts of construction, which requires readers to aggregate the data presented in the Chapter 6 (“Construction work”) with that set out in Appendix G (“Noise and vibration”), which itself is in three parts; from my reading, the data is not capable of being reconciled. For example, it is not possible to properly determine how the construction timelines set out in Chapter 6 (for my area, Tables 6-26, 6-36 and 6-38) align with each of the components of the work assessed in Appendix G (for my area, Table 5-135 of Part 1) in order to form a reasonable picture of how much noise is being made at what time and for how long.

More generally, the “consultation” sessions have offered little hard evidence to difficult questions, with canned answers which don’t satisfactorily address genuine concerns. On one online session, one of the engineers’ answers to a genuine question was comprised of repeating the phrase “etcetera etcetera” several times within the sentence, rather than providing the underlying information. At a minimum, the NSW Government should be required to re-start the process without the pro-project spin in evidence throughout the work undertaken.

Finally, renewed consultation is required: firstly because the community consultation has clearly been inadequate. I am aware, for instance, that local schools have been unaware of the coming project and are rushing to make submissions, which would ideally benefit from deeper thought. Also, given the comments about the flawed design, if TfNSW addresses these, they will inevitably result in material design changes which would justify requiring that the environmental approval process being revisited.