

Thank you for the opportunity to provide a submission on the Beaches Link EIS.

As a northern beaches resident, **I object to the project** for the following reasons:

1. **There is no analysis of viable transport alternatives that would be socially, economically and environmentally superior to the Beaches Link proposal:** The EIS states that 'demand would not be high enough to make investing in a specific or dedicated rail link to the Sydney CBD a viable alternative' (page E-14). However, there is nothing in the EIS or in the other documents referred to in the EIS that supports this statement and that precludes non-roads-based transport solutions for the northern beaches. The EIS only analyses roads-based alternatives and, therefore, does not satisfy the critical and essential EIS requirement to properly consider feasible alternatives. Such alternatives could include an extension of the metro project from Crows Nest or Chatswood to the northern beaches or the building of a dedicated rail link – both of which would potentially have a far lesser environmental impact and far greater long-term social and economic benefits. Such alternatives would also help meet the requirement to provide for intergenerational equity, with younger people moving away from car ownership and supporting the need for action on climate change. The northern beaches needs a sustainable transport solution. NSW taxpayers' money should not be diverted away from public transport solutions that would reduce congestion, support lower emissions targets and provide for intergenerational equity. Please do not allow such a beautiful and unique part of Sydney to be destroyed for such minimal and questionable benefit. A new EIS needs to be released for public consultation that properly analyses public transport options and compares pre-construction and post-construction traffic, environmental and health impacts.
2. **Analyses in the EIS are based on out-of-date traffic data:** The EIS uses 2016 traffic data. Any decision on the Beaches Link needs to be based on up-to-date data that reflects the longer term impacts of the introduction of the B-line bus services, as well as changes resulting from the COVID-19 pandemic and the transition to remote and regional working. The [RMS's Traffic Volume View tool](#) on its website shows that average daily traffic volumes on the Spit Bridge have decreased from 63,349 vehicles in 2016 to 47,960 vehicles in 2021 – a decrease of over 24%. This decrease means that much of the modelling in the EIS – for example, in relation to air quality, time saved, congestion – is not valid. A new EIS needs to be released for public consultation that is based on up-to-date and accurate data for optimal decision making on the merits of the project.
3. **Traffic congestion and bottlenecks will become significantly worse:** Congestion and traffic in the area are likely to become significantly worse – in particular, at major intersections around the tunnel portals. The EIS (Appendix F) acknowledges that there will be an unsatisfactory 'level of service' (i.e. unacceptable wait times) at several major intersections. Any time savings in the tunnel will be quickly eaten up by induced demand as well as significant congestion around the tunnel portals. In this context, how will the Beaches Link proposal benefit the majority of northern beaches residents and how can the estimated \$14 billion plus of taxpayers' money required to build the tunnel be justified for such questionable gains for the community? On the basis of traffic analysis alone, the project should be rejected by the Minister for Planning.

4. **There is no analysis of how the project will contribute to the government's objective of achieving net zero emissions by 2050:** Given that the NSW Government has committed to net zero emissions by 2050 under its [NSW Climate Change Policy Framework](#), the EIS should explain how the project will reduce emissions. The EIS does not explain how the project will meet the government's own aim of maximising 'the economic, social and environmental wellbeing of NSW in the context of a changing climate and current and emerging international and national policy settings and actions to address climate change' (page 1 of the framework). This is a significant oversight and is a further reason why a new EIS needs to be released for public consultation that properly considers lower emissions alternatives to roads-based solutions.
5. **Levels of pollutants and toxins are dangerous and unacceptable:** The concentration of pollution from the tunnel around two unfiltered ventilation outlets at Seaforth and Balgowlah is unacceptable. The EIS is potentially misleading when it refers to 'zero portal emissions', given that the unfiltered ventilation outlets are located next to the Seaforth and Balgowlah portals and the concentration of dangerous pollutants will have significant and unacceptable health consequences for residents and children/teachers at schools located near the outlets and portals. The EIS (Appendix I) shows, for example, that there will be more emergency department hospital admissions for children with asthma and that mortality (all ages) will be greater. How is this an acceptable cost? In a new EIS, a proper cost-benefit analysis also needs to be provided for filtered versus unfiltered ventilation outlets with input from independent health experts on the longer term impacts and costs to the community and economy of increased pollutants.
6. **The exclusion of Northern Beaches Secondary College Balgowlah Boys from the receptor modelling is unacceptable:** With around 1,000 students attending Balgowlah Boys – located about 300 metres from the Balgowlah unfiltered ventilation outlet – it is essential that air quality and health impacts modelling is conducted for this site. A new EIS needs to be released for community consultation that includes Balgowlah Boys as a receptor site.
7. **Impacts on vulnerable and endangered species are irreversible and unacceptable:** The northern beaches has many precious habitats, with many vulnerable and endangered species around the proposed Beaches Link tunnel, including the Red Crown Toadlet, the Spotted-tailed Quoll, the Powerful Owl, the Eastern Bentwing Bat and the Grey-headed Flying-fox. While the EIS attempts to explain how the effects on these species and habitats will be mitigated, the cumulative and long-term effects are unknown and the risk is too great for these important species. It is inevitable that these species will be either entirely lost from the area or severely impacted. Also of grave concern are the disastrous impacts of the project on Flat Rock Gully. These are unacceptable costs for a project that appears to provide little medium-term or long-term benefit to the community.
8. **Levels of water contamination are dangerous and unacceptable:** With significant contaminated water expected in water ways, including dangerous toxins in Middle Harbour and surrounds, as well as the devastating and irreversible loss of water flow along Burnt Bridge Creek, the environmental impact of the proposed Beaches Link is far too great to justify the claimed benefits. For example, what conditions will ensure that the 428,000 litres of wastewater (Appendix O) that will end up in Manly Lagoon at Queenscliff (and subsequently in the world-renowned Manly ocean beach tourist area)

are clean? The likely detrimental impact from the permanent and significant loss of groundwater across the entire tunnel zone is also unacceptable.

9. **The irreversible impact on Sydney's Aboriginal heritage would be disastrous and unacceptable:** There are 76 known Aboriginal sites on the shores of Middle Harbour, with significant sites at Bantry Bay and Manly Vale. These sites include irreplaceable examples of the art and culture of Indigenous peoples of the Sydney Region. The NSW Government is responsible for ensuring that these sites are never violated or destroyed. The Beaches Link is incompatible with the cultural sensitivity of the area and should be rejected by the Minister of Planning.
10. **There is a lack of clarity and certainty around pre-construction and post-construction building reports and damage rectification for properties affected by substratum acquisition:** The criteria for property reports for those property owners who are subject to substratum acquisition need to be made clearer. Pre-construction and post-construction property condition reports must be free and independent. Use also needs to be made of satellite technology pre-construction and post-construction – paid for by the NSW Government – that shows levels of subsidence in and around the substratum acquisition area. If a property is damaged in an area of subsidence as a result of movement (e.g. any cracks or doors/windows jamming) during or after the tunnel construction, then in good faith the NSW Government needs to take responsibility for the damage and rectify it. It is unconscionable for this obligation to be outsourced to the contractor and for the property owner to be required to prove causation as has been the case with other tunnel projects. There needs to be a presumption that, for certain types of damage (however small) that can be caused by ground movement, it is as a result of the tunnel construction. The NSW Government, as the decision maker for the project, should take responsibility for rectifying the damage resulting from its decision and set up an easily accessible compensation fund for affected property owners.
11. **There is a lack of transparency around the business case for the project:** The business case for the Beaches Link needs to be released for public consideration before a decision on the project is made by the Minister for Planning and before any contracts are signed by the NSW Government in relation to project construction.
12. **There has been inadequate time for community consultation:** The NSW Department of Planning's website states that 'community participation is an essential part of the State significant infrastructure (SSI) process'. The EIS contains over 10,000 pages of complex material and its release coincided with a lockdown on the northern beaches as well as the holiday period. Despite reasonable and considered requests from community groups and schools directly affected by the Beaches Link proposal, no extension has been granted. A long-term transport solution for the northern beaches will be costly for the taxpayers of NSW, the decision should not be rushed, and sufficient time needs to be given for proper and genuine community consultation. This is essential to achieving the best outcome for future generations.