Objections to the Beaches Link and Gore Hill Freeway Connection

Objection - Damage to human health

- There is no safe level of pollution from emission stacks.

- Volume 2F of the EIS (Appendices I to K) p 69 states: "The available evidence does not suggest that there is a threshold below which health effects do not occur so there are likely to be health effects associated with background levels of PM 2.5 and PM 10 even where the concentrations are below the current guidelines".

- The EIS also reports air quality being affected by heat and bush-fire smoke etc. Given the location of both stacks (particularly the Wakehurst Parkway one) in areas very prone to summer fires and back-burning, will the resultant extreme air pollution cause the tunnels to close until air quality improves? Or will traffic stack pollutants continue in periods of extremely poor air quality from background emissions, thus further polluting our local homes, schools, preschools and retirement/nursing homes?

- Volume 2F of the EIS (Appendices I to K) page 35 states; "Three project specific monitoring stations for the WHTBL program of works were established for Transport NSW in 2017. One of these was at a background location and the other two were at locations near busy roads. Given the date of deployment, the time period covered was too short for these to be included in the development of background concentrations and model evaluation".

- It has been confirmed that base (starting point) data sets on surrounding air quality used for charts relating to the Beaches Link sections of the EIS were not taken from the area local to Seaforth and Balgowlah. And yet we are told by the WHBLT team "As you may have already read, the independent NSW Chief Scientist and Engineer has released a report in relation to road tunnel air quality. The report found that emissions from well-designed road tunnels cause a negligible change to surrounding air quality".

- Given they openly admit they do not have figures on surrounding air quality for the Seaforth/Balgowlah area, how can they show "change" to levels of pollution and the resulting added mortality rates? How can we accept any 'facts' in the EIS are correct if the most basic scientific methodology has not been adhered to?

- My husband and I, our children and our grandchildren all live halfway between the stack at Wakehurst (Seaforth) and the one at Balgowlah. We all live, work and attend school in this same area. WHTBL project specialists claim to have shown modelling exists for this doubly-cursed area. And yet we cannot find specifics about how the double dose of pollutants will affect us, our health, my grandchildren's physical development.

- The Balgowlah stack is of particular concern because of the topography of its siting. The WHBLT project team have said their computer modelling for pollution from this stack takes into account all variables. Given we already know their figures are rubbery and misleading, how do we know exactly what has been inputted to this computer programme? This is

particularly relevant given this statement from the Chief Scientist's paper on Options for Treating Road Tunnel Emissions. **"The accuracy of dispersion modelling of road tunnel stacks hinges on accurate estimates of traffic flow, traffic composition, traffic speed, vehicle emission factors, ventilation system operating parameters, and the stack exhaust temperature (which influences how buoyant the emissions are). <u>These are difficult to specify before a tunnel opens</u>. However, this uncertainty is generally effectively managed through: • Appropriately conservative modelling assumptions • 'Regulatory worst case' modelling scenarios in which a stack is assumed to operate continuously at an upper limit of emissions, which in practice would rarely or never occur. It is common practice to assess stack impacts with respect to a jurisdictions air quality impact assessment criteria which can be consistent with ambient air quality standards and guidelines, such as the National Environmental Protection Measure for Ambient Air Quality (AAQ NEPM), or international equivalents, and WHO Guidelines. p15**

- It goes on to state; **"An exception would be dispersion in the lee of obstructions which typically requires more advanced modelling techniques and remains subject to some uncertainty."** This directly relates to the case of the Balgowlah stack. It sits in the lowest point in the valley. It is immediately surrounded to the north, west and south by hills of 100 plus metres height. It would appear any 'modelling', particularly drawn on already suspect figures, cannot accurately predict what levels of pollution will surround the Balgowlah stack.

- Given all these uncertainties, it was not surprising current Premier Gladys Berejiklian said when in Opposition in 2008: **"World's best practice is to filter tunnels. Why won't they (Labor) allow people to sleep at night, knowing their children aren't inhaling toxins that could jeopardise their health now, or in the future?"**

- The NSW Legislative Council's Public Accountability Committee report on the Impact of the WestConnex Project in 2018 recommended that; **"The NSW Government install on all current and future motorway tunnels, filtrations systems in order to reduce the level of pollutants emitted from ventilation stacks."**

- There are many examples of filtered tunnels being used in Japan, Spain, Norway and other countries.

- And yet the Liberal Government stubbornly refuses to use the state-of-the-art filtration systems that exist elsewhere in the developed world on NSW tunnel stacks. The EIS continually states there is no need for tunnel filtration in properly designed tunnels. And therein lies the problem. Given the multitude of flaws and misleading 'facts' in the EIS, the public does not trust we will get a "properly designed" tunnel.

- The only reason not to filter the stacks is purely economic – they cost more to install and run than the current proposed tunnel design. Given the running costs will be born by whichever concern buys the tunnel system, one must assume the Liberal Party is trying to

keep costs down for the benefit of potential owners. With absolutely no regard for the health of those voters living near the stacks.

Objection - Damage to the environment

- I am appalled that while advanced engineering methods exist, the EIS proposes the cheapest and most environmentally damaging method for the two tunnels at Wakehurst (Seaforth) and Balgowlah.

- Apart from the obvious destruction of 14 hectares of bushland which supports a variety of native wildlife (and provides the green lungs of this area and indeed this city), the EIS opening admits our one major creek, Burnt Bridge Creek, will be 'de-watered'. Destroyed, in simpler terms.

- The rich biodiversity supported by Burnt Bridge Creek depends on the ground and surface water within the catchment that flows into and along the creek.

- The EIS reveals the permanent removal of up to 96% of base flow from the creek and substantial groundwater drawdowns across the entire catchment.

- It also says: Groundwater baseflow impacts due to drawdown at potentially connected surface water systems Flat Rock Creek, Quarry Creek, and Burnt Bridge Creek are predicted to occur due to the project. This could impact ecosystems reliant on the water within these creeks. App N, pg 12.

- The EIS says: "While these reductions could be considered significant, in particular for Burnt Bridge Creek and Quarry Creek, they are unlikely to result in a complete loss of aquatic habitat. Pools would be retained and there would still be high flows within the waterways immediately after rainfall events."

- Such an analysis and conclusion have no scientific foundation. It is obvious that the removal of 96% of the water from a creek that supports such biodiversity, including many species that rely on access to its waters, will have devastating impacts for ecosystems from Seaforth to Manly. It also fails to consider or investigate the implications of reduced water flow for the Manly Lagoon including reduced oxygenation and the impact on its aquatic life. The pools the EIS mentions – again with no scientific backing – would essentially be stagnant and, therefore, unable to support many forms of life. They would also put residents at risk of mosquito borne diseases in an area known for Ross River Fever.

- By contrast Northern Beaches Council's experts, in their draft submission note: "The EIS trivialises what would be significant hydrological and ecological impacts on Burnt Bridge Creek. The creek would essentially function as a storm water channel... Other impacts include the effects of ground water drawdown on riparian vegetation and other terrestrial flora and fauna (protected flying foxes etc) reliant to some degree on available freshwater

or aquatic communities." The EIS fails to assess impacts downstream on Manly Lagoon including on endangered ecological communities.

- There are also massive implications to pollution levels in Middle Harbour from proposed dredging. I know there will be many more competent submissions on this environmental disaster.

Objection - Damage to the Liberal Party and its standing in New South Wales.

- I have actively been a member/supporter/voter for the Liberal Party since I was 14.
- I always believed it struck the right balance between supporting individuals and supporting the mechanisms that allowed our country and state to function.
- But in the last 24 months, I have seen what absolute power has done to the Liberal Party.
- Decisions are continuing to be made with no regard to the needs of its voters/supporters. We are not stupid. We can see who profits from these decisions. And it isn't the voters of NSW.
- Classic examples of this are the WHBLT and "improvements" to public transport services in Sydney's Northern Beaches.
- Both are cynical political exercises to provide business opportunities for large companies at the expense of NSW voters.
- Transport changes to the Manly Ferries and bus routes servicing Seaforth, North Balgowlah, Balgowlah, Balgowlah Heights and Clontarf have devastated our communities. Decisions have been made with no consultation or understanding of how the integrated public transport network works.
- If a relatively simple issue like this has been handled so disastrously, how can we expect to be heard with something as major as the health of our community and environment?
- I despair for the Liberal Party. It has lost all connection to its supporters (maybe I should say non-financial supporters). I fear the public backlash in traditional Liberal Party seats will be so overwhelming, I will not see its return to majority government in my lifetime.

Conclusion

In conclusion, the WHBLT EIS is a cynical, voluminous document aimed to confuse not just residents, but our elected representatives. The cost to NSW in financial, health and environmental terms is huge. Any perceived benefit, when you actually look at the projected time 'savings', is very small. The only ones who gain significantly from this project will be those who win the tender to build it, and those who will buy the right to operate it. It seems a very poor use of taxpayer dollars.