

Beaches Link Tunnel Project – EIS response

Please find below my objections to the tunnel, including but not limited to the latest link road design and the unfiltered ventilation stack locations on the northern beaches. In addition I have detailed my objections relating to specific locations within the Balgowlah and Seaford communities and the use of Balgowlah Golf Course (BGC) as a construction site for this project:

I object to:

- The project cost and the lack of any publicly released business case used to justify this project when it is based on out-of-date information about public transport demand and future traffic forecast data. The time savings outlined in the report do not factor in the Dee Why to Chatswood express bus service (Bline) for example.
- The tunnel design which does not allow for filtered ventilation stacks at both Northern beaches' portals, posing a significant long term health risk to surrounding residents and schools. This is despite pre-election promises by Gladys Berejiklian that all tunnels should be filtered.
- This project clearly ignoring publicly available strategy documents such as the one listed below, which detail how we must reduce our impact on climate change. In the document 'Move – Northern Beaches Transport 2038' it states that they aspire to reduce the usage of cars by 30% by 2038, refer to pages 12 and 13. This contradiction raises obvious concerns about the short-sighted nature of spending so much taxpayer's money on a road tunnel designed for cars?
- This project not taking into consideration Australia's commitment to the Paris Agreement with regards to climate change.
- This project which will lead to the destruction of the Balgowlah golf course green space which is inconsistent with the SEPP design and Place objectives.
- The lack of alternative, viable transport options reviewed instead of building a toll road. In 2021 it is extremely disappointing that Sydney is hell bent on spending \$12,000 million (\$12 billion) on a road infrastructure project which will encourage people to get in their cars rather than applying a greener lens to address traffic concerns. Instead we should be looking at ways of introducing greener public transport options; trackless trams, a train line, building more cycle ways and considering Park and ride bus options adopted widely overseas to discourage people from driving into our CBD.
- This toll road project which will create more traffic. It has been demonstrated all over the world that toll road construction increases air pollution, only results in creating induced traffic demand (Jevon's paradox) so that traffic levels with return to pre-construction levels within 2 years of tunnel completion and has an exceptionally high and negative impact on those living close to the construction area. This clip demonstrates the paradox: <https://mobile.twitter.com/abctv/status/1182468049011535872?lang=en&fbclid=IwAR2colkOCA9oIKr5CdYAWVVqIDpitOIEb4qVaAS-nJGpXtMeHav9BndJz7>
- The lack of serious consideration given to the extra 40,000 cars that will use the tunnel to access the northern beaches on the weekends. It is very hard to park in Manly currently on the weekends, how will the local areas which already attract so many people to the beaches park when they exit the tunnel? This cannot be left to local council to address.
- The concept plan for playing fields, car parks and recreation facilities which has lacked consultation with residents. This must be developed with immediate engagement, consultation and input from local residents and the creation of a community group.
- The impact that turning Balgowlah golf course into a construction site will have on property values for those residents that live next to the golf course and oval. The EIS notes the construction impacts and changes to the outlook of these properties referencing noise,

pollution, air quality and ambient light impacts on closely impacted houses, but this proposed design has not been altered effectively despite the community consultation and has therefore not adequately outlined the real impacts to the community which include the health impacts from noise, air quality and the mental anguish that these changes to living will cause.

During construction

Viewpoint 5 – Paris Street dwellings	High	Low	Moderate
Viewpoint 6 – Pickworth Avenue dwellings	High	High	High
Viewpoint 7 – Balgowlah Oval	Moderate	High	High – moderate

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- There is insufficient dust mitigation which will result from tunnelling and construction activity and this needs to be put in place to minimise 5 + years when residents air quality will diminish such that it will not be possible to open windows and hang out washing for example.
- Visual impacts of the changes. Compensation needs to be afforded to those whose outlook will change from a natural looking green outlook, looking out over trees, flora and fauna and a golf course and listening to the birds singing in the mornings, to a construction site, an access road, facilities buildings, car parks and playing fields which will result in noise from shouting and whistle blowing (which James Griffin stated would be a concern for him).

Table 22-23 Visual impacts during operation – Balgowlah precinct

Viewpoint	Sensitivity	Magnitude	Overall impact rating
Viewpoint 1 – Burnt Bridge Creek Deviation	Low	Low	Daytime: Low
			Night time: Negligible
Viewpoint 2 – Hope Street	Moderate	Low	Daytime: Moderate – low
			Night time: Low
Viewpoint 3 – Serpentine Crescent dwellings	Moderate	Moderate	Daytime: Moderate
			Night time: Low
Viewpoint 4 – Burnt Bridge Creek Deviation existing shared user path	Low	High	Daytime: Moderate
			Night time: Negligible
Viewpoint 5 – Paris Street dwellings	High	Moderate	Daytime: Moderate
			Night time: High – moderate
Viewpoint 6 – Pickworth Avenue dwellings	High	Moderate	Daytime: High – moderate
			Night time: High
Viewpoint 7 – Balgowlah Oval	Moderate	Moderate	Daytime: Moderate
			Night time: Negligible



Figure 22-20 Existing view west over Balgowlah Golf Course from dwellings in Pickworth Avenue Creek



Figure 22-21 Proposed view (year 1 of operation) west over Balgowlah Golf Course from dwellings in Pickworth Avenue

- The tunnel portal has been moved farther south and as a result the location of the unfiltered ventilation stack is closer to both residents and schools. As depicted in the 'design' from November 2019, shown below, it was advised that Balgowlah oval would not be impacted during construction.

- The link (access) road location. The immediate community and residents need to be consulted on the location to minimise the impact of construction, noise, dirt, dust, and pollution. The access road needs to be reconfigured and modified so that it is not constructed close to the existing oval and the unfiltered ventilation stack has not been located as far away as possible from the properties that run along the golf course; Pickworth Avenue, Westlake place, Paris, and Brighton streets.



Proposed Design for the Link Road through the Balgowlah Golf Course and the Location of the Exhaust Emission Stack*. Source: RMS Community Update – August 2020

- Inaccurate and misleading diagrams produced by TSFNW on the Exhaust Emissions Stack which is misleading because the stack can only be seen on the picture above by using a magnifying glass. At approximately 6.5 storeys high– the stack will be one of the taller structures in Manly.
- The EIS which details impacts has not been updated to reflect the revised location of the link road and unfiltered ventilation stack.
- The Air pollution data and other information which has been based on the previous location of the unfiltered ventilation stack and the link road which was previously not located as close to the oval.
- Safety issues. Pedestrian access to the oval and scout hall will be dangerous if the access road remains as depicted in the EIS.
- The proposed link (access) road lacks detail confirming exact height and location.
- The construction hub located in Balgowlah golf course which will destroy a local greenspace which is relied upon by all living things in this area.
- The green space which is home to 650+ established trees including advanced specimens of Cyathea Australis, native palms etc. BGC will not only be missed by many golfers, a high percentage who are older and use the game to remain connected to people, but it has also

proved to be so valuable to help people manage mental health issues and stress especially during COVID. People were able to continue to play golf as it is an outdoor means of exercise.

- The social impact removing this sporting option for locals will have; it will lead to social alienation particularly for our older local golf and walking community.
- The impact this project will have on the destruction of green space in BGC, the loss of natural
- The construction which will result in a reduction of creek water flow, increased air, and water pollution, create excessive dust, the destruction of wildlife habitat and the destruction of wildlife; animals will not be able to survive the introduction of pollution in the water ways and the lack of water supply which animals rely on will dry up when all the water flows into the tunnel during construction.
- No allowance being made for relocating the wildlife in the BGC or in the Burnt Bridge Creek (BBC).
- The use of Cofferdams which will pollute our oceans as the use of curtains during dam construction which cannot guarantee to contain all pollution and toxins into our oceans. The silt curtains will only go down to 12 metres in an area of up to 34 metres depth.
- The pollution which will enter our waterways and oceans. This could have a very negative impact on tourism and encouraging visitors to aid recovery of business on the northern beaches if the water is polluted and the beaches are forced to close if pollution levels mean it is unsafe to swim in the sea, or in our lagoons, or Manly Dam.
- The project design which includes an unfiltered ventilation stack located in an area close to residents, schools, a childcare centre, and businesses. After tunnel construction, the green space will contain several different sporting fields.

Given the world-first ruling in London that Ella Kissi-Debrah's death was caused by air pollution, how does TfNSW as well as both local and state governments plan to address the negative health impact of the unfiltered ventilation stack which is shown to be near schools and homes?

Who will be liable for health issues for those exercising in the "green space" near the unfiltered stack and those residents who live within 1200m of the stack, the distance which chief scientists modelling advises there will be the most concentrated ground level emissions?

- The link road on safety grounds given it is too close to the oval and the local schools which use the oval for sport during and after school.
- The link road location which is now closer to the oval and the trees that surround the west side of the oval are now, along with hundreds of trees in BGC, to be destroyed as a result. These trees provide several benefits to the local community:
 1. Form a light barrier reducing the impact of lighting from roads that do not currently exist
 2. Help form a natural barrier to catch dust and fumes from travelling out of the construction site
 3. Reduce some noise from construction and traffic
 4. Absorb pollution and fumes

From Appendix W part 2 of the EIS tree numbers and tree groups 720, 721, 758-771, 20331-20360 all located on the Eastern side of the Golf course BL assessment area 4.



The oval is used by local schools; St Cecilia's and Balgowlah Boys schools, it is used by the AFL team and by many cricketing clubs, local dog walkers and the broader local community.

- The impacts on the oval. The oval needs to remain intact and not impacted by the link road or construction hub. The trees that surround the oval outside the picket fence need to remain and to be protected as they provide very important shelter for birds and shade for humans as well as being important for the local environment as outlined in point 1-4 above.
- Projected travel time savings: poor/inaccurate traffic data needs to be redone
- The current EIS design which does not allow for accurate, realistic, or revised traffic data following COVID impacts and the high number of people who now work from home.
- The traffic time savings outlined in the EIS which have been used in the traffic model by TfNSW based on 2016 data and this has not been revisited to factor in the changing lifestyle of those living on the northern beaches and their ability to successfully work from home. Many people now work and live close to or at home and are supporting local neighbourhood businesses following COVID.
- The excessive construction noise that will impact residents, businesses, and schools within kilometres of BGC on local streets including but not limited to Pickworth Avenue, Westlake place, Brighton Street, Paris street, Maretimo Street, Wanganella Street, and all streets adjacent to or connected to these streets. There will be an inability to concentrate and sleep

which can have a significant impact on mental health and will increase stress levels of those going about their day to day lives and working from Home.

This will also impact students at Bally Boys and St Cecilia's who will not be able to concentrate with truck movements and construction noise in BGC construction hub.

- The rat run traffic impacts during and after construction with people trying to avoid the construction activity and post construction those that want to avoid using the tunnel due to the toll costs.
- The lack of traffic congestion solutions. This cannot be left to council to address. Planned measures to address traffic congestion due to the construction need to be documented now. If the Beaches link tunnel proceeds the traffic impacts on areas in close proximity to the construction portal and beyond will make traffic congestion impossible and more people will be forced to work from home as traffic will back up in BBCD back into Manly vale and all feeder roads into BBCD and traffic traveling towards the Spit.
The traffic delays during the construction phase for all residents that ordinarily travel along the Wakehurst Parkway or the Burnt Bridge Deviation.
- The lack of parking required for construction workers for the project duration. There need to be measures in place to prevent construction workers from parking in Pickworth Avenue and other streets close to the construction hub. The EIS incorrectly states that parking is available (App. F p176).