

Overview:

After living for some 40 years on the northern beaches and happily commuting by bus, I have recently found myself struggling to get to the major North Shore hospital where I work at due to sudden changes to local bus timetables. Given that bus services were slashed without any prior consultation at the same time as the EIS was published, it is hard to avoid concluding that Transport for NSW is using a 'push' mechanism to encourage more people into private vehicles.

Should my new 1 hour and 40 minute bus commute, up from about 45 mins, push me into my car I would become a traffic statistic used to justify the need for the supposedly 'congestion busting' tunnel. Private car travel, however, would never be a solution for me and many other workers as driving – via surface roads or a tunnel -- would leave us with another problem; a lack of parking at our destination. As I work in a busy hospital, there is never any on street local parking and limited paid private parking. To add the cost of private parking onto a new toll would, in my case, be prohibitive.

As a transport model, merely funnelling more and more cars into various CDB areas via a tolled tunnel simply creates more congestion as those cars look for parking. Likewise, as the tunnel will bypass various roads to offer more direct access to the beaches from the western suburbs we can anticipate large numbers of cars spilling out on weekend without parking available and, hence, generating local congestion.

For public transport users in my suburb the tunnel is a faux 'solution' to a 'problem' many of us did not have until the bus changes of December, 2020. I would prefer to continue to use public transport and it is clear that more public transport, not less, would encourage people to leave their cars at home, hence achieving reductions in traffic and congestion - but without the huge costs the tunnel will impose on taxpayers, on the residents, children and workers of Seaforth, Balgowlah and surrounding areas and to our wonderful natural environment.

I believe the EIS for the Beaches Link project highlights numerous unacceptable impacts and fails to detail mitigating actions that would reduce health risk and stresses on residents, students and local workers and prevent damage to the environment. I am especially concerned about these issues:

1. Air quality, health

The government has flatly refused filtration in the ventilation stack that is so close to Bally Boys, St Cecilia's and Seaforth Public Schools in Balgowlah, and Anzac Park Primary School in Cammeray amongst others. In the EIS, there are thousands of pages of technical information that is supposed to justify their decision not to install filtration. I live within the footprint for the most concentrated emissions, based on the Chief Scientist's model. Our local schools,

homes, shops and businesses are also within the 200-1200m radius. The EIS data raises many concerns about the quality, or otherwise, of our air during construction (dust, construction vehicles etc) and the likely long term impacts of the unfiltered emissions stacks. It also demonstrates that Transport Minister Constance will not stick to his promise to make sure no unfiltered stack were situated next to schools.

One key worry is that 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." These locations are near Wakehurst Parkway, Burnt Bridge Creek Deviation and possibly Cammeray (Figure 5-1 and 5-2 (pp36/7)). The data from these monitoring stations is vital to the question of air quality for this project. **It is scientifically impossible to draw air quality conclusions for the Seaforth/North Balgowlah/Balgowlah/Balgowlah Heights areas based on data sets from other, more congested areas of Greater Sydney.**

In Volume 2F, Annexure H, base data for nitrogen dioxide levels in Tables H5 (Gore Hill Freeway) and H7 (Burnt Bridge Creek Deviation) are exactly the same.

It is clear in this case the "data" being used for projections and modelling with the Burnt Bridge Deviation stack (in a relatively unpolluted suburban area) **is actually the base data from the congested, polluted Gore Hill Freeway monitoring station. This is not an accepted scientific method of making projections. There is no scientific basis for any projections, modelling etc relating to air quality surrounding the Wakehurst Parkway and Burnt Bridge Deviation stacks as they are not based on facts.**

The Air Quality sections relating to the Wakehurst Parkway and Burnt Bridge Deviation fail to provide accurate information the public is entitled to.

Transparent air quality studies and modelling of the sites of the stacks must be undertaken to deliver reliable information that can withstand scientific scrutiny. These must be available to both the public, not just the politicians who are making this decision on our behalf.

2. Noise and congestion

The EIS and TfNSW concede that traffic congestion in Seaforth, Frenchs Forest Manly Vale and Balgowlah will increase significantly during construction and once the tunnel is built. However, it says that this is a problem for the Council to sort out.

The Northern Beaches Council's EIS submission includes requests for TfNSW to upgrade local roads and intersections that will be problematic – these include:

- traffic amelioration measures (i.e. speed bumps or similar) on Manning, Bardoo, Woodbine, Myrtle, Kitchener, Wanganella North, Rickard, Seaview, Wanganella South, Kanangra, Maretimo, Ethel street
- changes to intersections/roads around Manly Vale already at capacity including Quirk road joined, upgrade to Freedom Furniture intersection, traffic light at Balgowlah Rd/Roseberry St, lane changes/widening of Kenneth Rd for exiting traffic, traffic light at Kenneth Rd/Roseberry St
- upgrade to Condamine St/Pittwater Rd intersection outside Warringah Mall
- widening Wakehurst Parkway to Dreadnought Rd, Oxford Falls (extra 6 minutes of delays here, but widening just pushes the problem further up the Parkway where it is 1 lane)
- upgrades to Frenchs Forest roads
- widening Frenchs Forest Rd outside hospital with 24hr bus lane, widening Forest Way, upgrades to Grace Ave, 3-4 new traffic lights.

This is a huge amount of work needed but there is no guarantee it will occur, or when it will occur, and even if it does it will mean even more traffic disruption and local congestion. Either way, with or without the new roadwork, people lose precious time in traffic jams at they try to find their way to the tunnel. The tunnel will not, therefore, reduce traffic congestion.

The draft of council's EIS submission states "Little work appears to have been done to assess the effect of the project on the local road network....seems to be a critical omission in the assessment".

Past experience suggests that these upgrades will not be factored into funding for the Beaches Link tunnel. This will mean the Spit Bridge bottleneck will simply be moved into Balgowlah and Seaforth, with long term knock on effects for many kilometres around.

Construction impacts – we will also be directly impacted by excess noise and vibration. There is no exact information on the mitigation measures that will be put in place to prevent this, but residents should be entitled to know more, as a condition of approving the project. We need full knowledge that adequate protections for residents will be provided.

3. Dewatering of Burnt Bridge Creek and its catchment with downstream impacts on ecosystems.

Like many people in my area, I regularly walk along Burnt Bridge Creek, where the EIS says the water flow will be reduced by 79% 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 rich biodiversity and vegetation along the creek (including the valuable Baringa Bush Reserve), the grey-headed flying fox colony, and 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 worsen – and will become more polluted when there is little rainfall to make up for the lost ground water.

The EIS fails to provide any evidence-based plan to save this vital creek, catchment and the flora and fauna that rely on it, or to prevent downstream impacts as far as our wonderful Manly beaches.

I am especially worried about our colony of grey-headed flying foxes at Balgowlah as all their sources of water will be removed during construction and the drawdown of ground water means they will no longer have access to a permanent water source. They will also be affected by long term construction noise and dust. The EIS states that when noisy roadworks occurs 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.

4. Lost bushland and endangered species along Wakehurst Parkway

More than 12 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, including one of the last tracts of critically endangered Duffy Forest, now one of the rarest types of vegetation on earth.

This includes Sydney Water site (Bantry Bay Reservoirs) at Kirkwood Avenue that was saved from development by the community 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 and the Eastern Bent-wing bat.

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.

Because so much high quality bushland is to be destroyed and this bushland is home to a number of critically endangered animals and plants, the TfNSW is required to “swap” it on a like-for-like basis for equivalent bush. This “offset” method is impossible in a practical sense, because there are no known pockets of land equivalent in their range of fauna and flora to

be destroyed by TfNSW in the Northern Beaches. Offsets mean that our unique and valuable flora and fauna will simply die in place during construction and will have no way to reappear and return.