

I wish to raise a number of objections regarding the Northern Beaches Link project following review of the EIS.

Objection 1

I object to biased the nature of the EIS narrative and the positive presentation of information.

The basis of my objection is that the information is contextualised with a positive outcome wherever possible, and negative aspects of the project are sugar coated.

The average Australian cannot devote the time needed to read 12,000 pages of detail, nor can they do the secondary research required to understand core principles of major project design.

As such most readers will have relied on summaries.

The summaries present an overly positive view of the project and impacts.

For example “Up to 90% of green space will be returned to the community”. This, and statements like it, are gross deception. They do not highlight that returned green space will be devoid of mature trees, situated under raised levels of toxic air, starved of ground water, affected by road noise, dominated by 6 storey chimneys, and punctuated by access roads.

Because of this I believe too few people understand the impacts on them from the construction activity, and the lack of long term benefits once completed.

There is a lot of commentary on social media expressing surprise at many aspects of the development when these are pointed out.

Before any further decision are made, a ‘warts and all’ community consultation is required where TfNSW is not controlling the narrative.

Objection 2

I object to the ineffective methods used for community consultation that have excluded much community concern about the project.

Specific to this objection is that community consultation should include all of the community and hear every voice.

Community consultation has failed this at a major level.

- a) The EIS is written at a level which an average Australian cannot comprehend. This has excluded evaluation and comment from a large section of the community.

Except of EIS chapter 6 overview	Readability indexes
<p>This chapter describes the proposed approach to construction of the project. It outlines the proposed construction program, footprint, methodology, working hour, materials, equipment, traffic management, site access routes, and temporary construction support sites.</p> <p>The construction works described in this chapter may be refined in response to submissions received during exhibition of this environmental impact statement, to further minimise impacts on the community or environment and/or during further design development and construction planning once a construction contractor has been appointed.</p> <p>Detailed construction planning would be carried out before construction of the project begins. This would include the identification of specific construction methods and program.</p> <p>The Secretary's environmental assessment requirements as they relate to construction works, and where in the environmental impact statement these have been addressed, are detailed in Table 6-1.</p> <p>The final construction program for the project would depend on future project procurement and packaging decisions. This may include one or multiple construction contractors.</p> <p>It is assumed that the Western Harbour Tunnel and Harringah Freeway Upgrade project, which is subject to separate assessment and approval, would commence construction before the Beaches Link and Gore Hill Freeway Connection project. Should timeframes for the project be advanced, some elements of the Beaches Link component may be delivered as part of the Western Harbour Tunnel and Harringah Freeway Upgrade works to maximise construction efficiency and minimise impacts in particular areas.</p> <p>Delivery of any elements of the Beaches Link component as part of the Western Harbour Tunnel and Harringah Freeway Upgrade works would be subject to the conditions of approval for the Beaches Link and Gore Hill Freeway Connection project and the requirements of this environmental impact statement, including relevant environmental management measures provided in Appendix V (Compilation of environmental management measures) and any other documents incorporated by reference in the approval.</p> <p>Works could include but may not be limited to cut and cover and trough works at Cammeray, construction of motorway facilities and ventilation tunnels at Harringah Freeway and traffic staging enabling works for the Gore Hill Freeway Connection.</p>	<p>Flesch Reading Ease score: 17.4 (text scale) Flesch Reading Ease scored your text: very difficult to read [f] [a] [i]</p> <p>Gunning Fog: 20.4 (text scale) Gunning Fog scored your text: difficult to read [f] [a] [i]</p> <p>Flesch-Kincaid Grade Level: 17.8 Grade level: College Graduate and above [f] [a] [i]</p> <p>The Coleman-Liau Index: 17 Grade level: graduate college [f] [a] [i]</p> <p>The SMOG Index: 15.6 Grade level: graduate college [f] [a] [i]</p> <p>Automated Readability Index: 20.7 Grade level: College graduate [f] [a] [i]</p> <p>Linsear Write Formula : 21.4 Grade level: College Graduate and above [f] [a] [i]</p>

- b) The Consultation sessions were virtual, and moderated
Participants were able to raise questions, however, not all questions raised were visible to all participants (only chosen questions were published in the meeting).

In a real community consultation, there is no censorship, and participants will hear and add to the views of all others who participate.

These sessions were ticking a box for consultation, I attended 2 sessions and do not feel consulted with.

- c) Misleading representation of information regarding impacts

The EIS uses opaque statistics for important impacts.

Data has been represented as percentages, absolute numbers, ranges and averages depending on which representation might attract least scrutiny.

I strongly object that the EIS does not provide the information to convey the Environmental Impacts fully and effectively.

For example, there are significant noise impacts to residents around the construction portals and tunnel routes. These are expressed as 'affected households'. This of course is a much lower number than 'affected people'. A person is affected by excessive noise, not a property, and this should be the actual measure of noise impact. Furthermore, an impact for a day is very different than an impact for a month, a year, or 7 years.

If the reader cannot determine the number of days times the number of people of noise impacts for all given locations, then the EIS is deficient.

In a different section, the EIS mentions 400+ heavy vehicle movements per day. 400 sounds a lot, but imagine if the actual increase was expressed as a percentage, stating 1000% increase to daily heavy vehicle movements in and out of the neighbourhood.

These are just 2 examples of misguidance. For every environmental impact, the question needs to be asked how the full extent of the actual impact should be measured rather than accepting a set of numbers out of context.

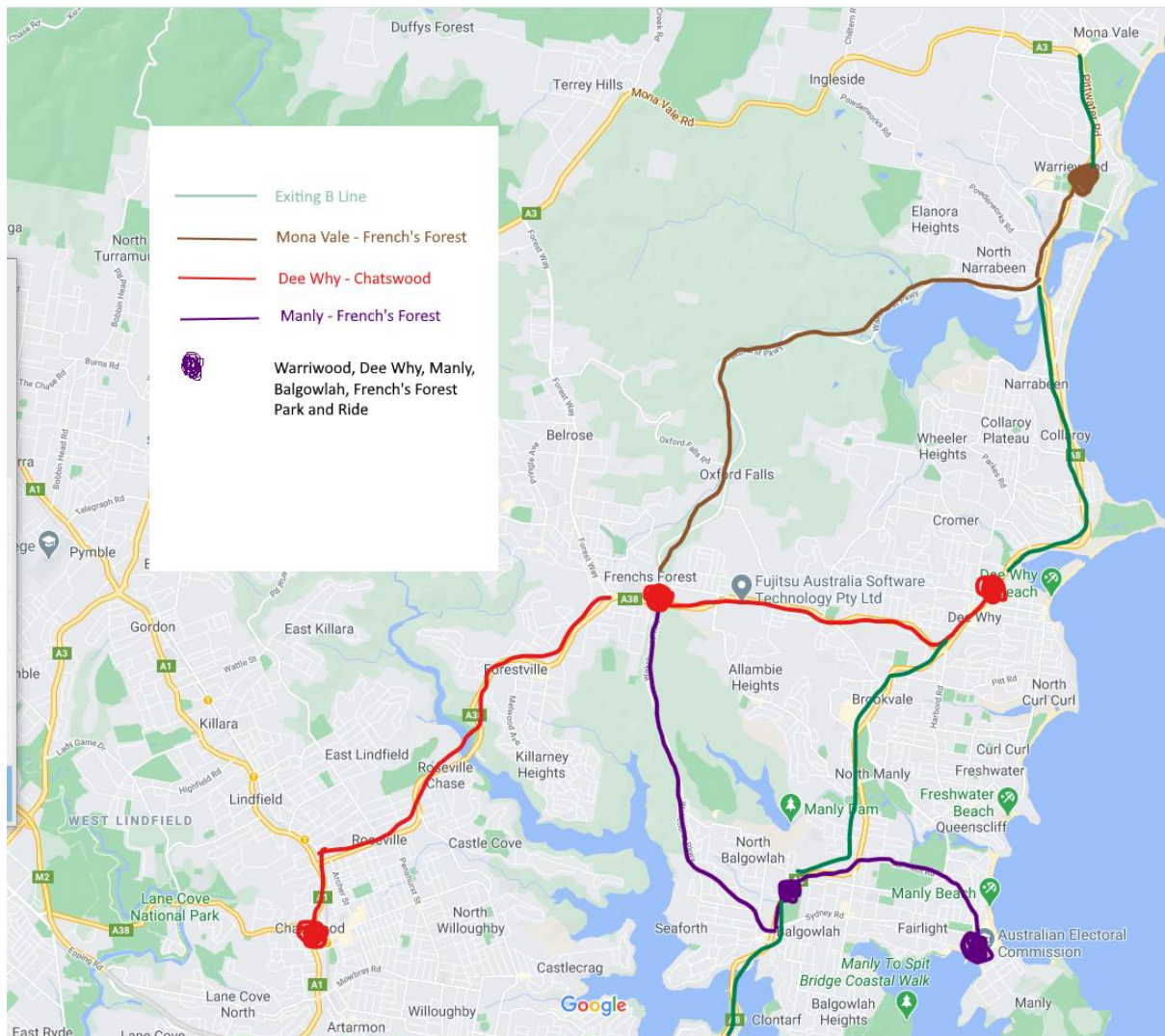
Objection 3

I object that alternatives, (in particular car journey reduction alternatives) have not been adequately considered.

The B Line bus service has been highly effective in reducing car journeys to the CBD.

The problem is the car parks are significantly undersized limiting the option to park and ride.

An extended B Line service, with adequate parking and community transport at a small number of stations would fit better with the proposed high growth population centres, avoid induced demand for car journeys, and be significantly lower cost.



Objection 4

I object to the proximity of 2 entrances, converging tunnels, and the concentration of impacts has a multiplier effect on the Environmental Impact to Seaforth, Manly Dam, Balgowlah and Manly Vale.

Additionally, the local roads are not designed to handle the volume of traffic that the Northern Beaches Link will feed to them.

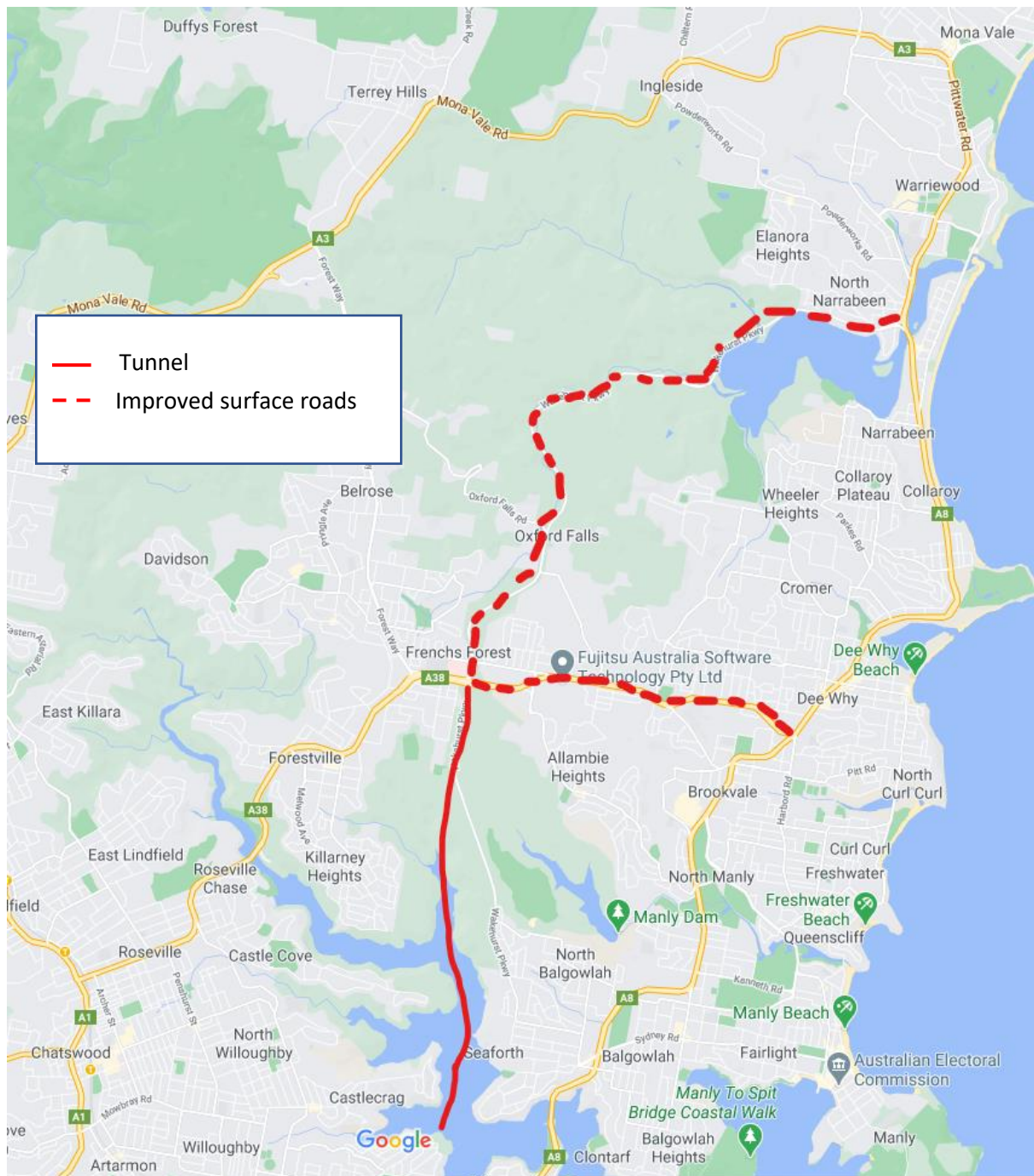
There has already been habitat loss at the Northern Beaches Hospital site. There isn't much left to save in that location. Plus works to-date have established the Wakehurst Parkway, Warringah Road intersection as a high volume traffic hub.

The Wakehurst Parkway is long overdue an upgrade to resolve flooding issues, and is suited for this due to wide shoulder, and natural concealment from surroundings by being low lying.

An upgraded Wakehurst Parkway together with a single tunnel entrance located further north could interconnect with the Northern Beaches more effectively with much less impact to the environment.

This could also resolve travel time from Palm Beach / Mona Vale to Northern Beaches Hospital and by putting more of the tunnel into concrete tubes running through Bantry Bay, construction may be lower cost and faster.

The Manly Dam catchment would be far less effected, and the Balgowlah, Burnt Bridge Creek impacts could be avoided.



By removing traffic north of Dee Why from Brookvale, North Manly, and Spit Bridge, existing routes would adequately serve Manly, Seaforth, Balgowlah.

A toll on Spit Bridge would also discourage road use, and toll avoidance by making the trip through the tunnel or over the spit an equivalent cost.

Objection 5

I object to the short lived benefits of the project which is shown to have little benefit compared with 'do nothing' by the time that construction is completed, or in the most optimistic assessment, only 10 years later.

The negative Environmental Impact will remain long after any benefit from the project has been eroded. It is a stop-gap solution, not a strategic solution, and the financial cost, emotional cost and loss of amenity of irreplaceable habitat, flora, fauna and leisure pursuits in nature are too high a price to pay for a few minutes saved in the car, especially with work from home rapidly affecting commuting patterns.

I have been timing my commutes to the city from driveway to car park near Town Hall.

The example below is typical of the travel time.

The time taken from entry to Sydney Road, and to reach Neutral Bay will be reduced by a maximum of 4 minutes (depending on how effective the proposed Maritimo Street and Tunnel access road lights are).



Given that we can do far better with transport alternatives than 'do nothing', the proposed tunnel is not a long term transport solution and should not be allowed to turn quiet suburbs that are surrounded by nature into concrete jungles and city sprawl.

Objection 6

I also object to unfiltered stacks – I simply don't care about the 'levels' when there is no safe level. Stacks can be filtered, and all receivers will benefit, so why should any receivers suffer a fall in air quality if they don't need to?

Objection 7

I object to sediment disturbance and effects on harbour life. The EIS does not identify swimmers as a user group in Middle Harbour. Clontarf beach and Balmoral Beach are packed with Children swimming and having fun. They do not need to hear pile-driving or to avoid eating the fish they catch, or to dodge sludge ferrying boats whilst doing so. The EIS really misses the point that the Northern Beaches in general, and middle harbour in particular are recreation areas. It is where we go to get away from the city, not to have it brought into our parks, waterways and beaches.

Objection 8

I object to the poor integration with local council. The proposed tunnel causes local traffic issues, parking issues, day tripper issues and a raft of other issues that the local council is being required to deal with. There is no plan, nor budget to deal with any of these flow on effects.

The EIS is supposed to include all effects of the development. By omitting to deal with the local traffic issues, and the projected extra demand at our beaches, parks, boat ramps, cycleways, walks and venues, of visitors arriving through the tunnel and Developments commencing because of the tunnel, the actual impacts of inserting 2 major feeder roads into the middle of communities is far understated. In reality, we all know there will be greater construction, additional TfNSW proposals to surrounding roads, more projects, and so on.

To summarise, this is a proposal that has not considered the unique environment it is going to destroy. It has employed metropolis scale experiences of tunnelling and motorway building in and under urban environments to a totally different quiet and leafy suburban context that needs a different type of solution.

The EIS itself demonstrates that the project does not bring sustainable benefits, but it does bring everlasting impacts.

Having lived on the Northern Beaches for 20 years, I can very much agree that a traffic solution is needed, and I can attest to that being based on reducing not increasing car dependency.

I am disappointed that TfNSW has shown a lack of vision and forward thinking and instead of using its brains to solve a problem, appears to be using its muscle to shoehorn in a white elephant.

Let's not look back with regret, when we could look forward with optimism.