

The EIS for the Beaches Link tunnel outlines the many negative impacts of the construction and operation of the private tolled facility. Having grown up on the Northern Beaches, I am familiar with the area impacted.

As a community minded person who is concerned about the future, I believe the tunnel project is outdated and will not serve the residents of the Northern Beaches or wider Sydney. It fails to recognise the sustainable infrastructure we need in this city, to serve our population while remaining environmentally responsible. It also does not serve a generation of young people who are increasingly shifting away from individual transport in favour of public transport, ride shares, car shares and active transport.

With any major infrastructure, there is an opportunity to create more liveable communities for the people of NSW - with better public transport, walkability, local shopping and business hubs and green space. The tunnel fails to benefit the community in any of these ways, while promising to cause financial, mental and environmental detriments.

I have many serious concerns about the impacts of its construction and operation. I cannot detail them all here. However, I am especially concerned that the EIS shows:

- It will cause serious and irreparable damage to the natural environment;
- It is not aligned with climate change goals that require urgent reductions in emissions;
- Increased traffic congestion around the tunnel portal will negate any savings in travel times in the tunnel for residents of the northern beaches;
- Large numbers of children, residents and workers will be exposed to unfiltered emissions via stacks and noise, dust contamination and congestion during construction; and,
- It is unlikely to be completed within budget or on time and is a poor use of large sums of public money, particularly given recent government spending during COVID-19.

Environmental damage

The loss of almost 2,000 mature trees along Wakehurst Parkway will have a devastating impact on Manly Dam Memorial Park and its rich biodiversity including numerous endangered species. This area was declared only in 2017 to be rich in endangered plant and animal species and worthy of conservation. The damage is likely to be permanent as the widening of the road beyond the ridge line means contaminated runoff is expected into the reserve both during construction and operation. Lighting all along the widened Wakehurst Parkway will detrimentally affect both nocturnal and diurnal animals that will die out from the area. Losses will include endangered Pygmy possums and many other endangered species. The loss of such a large chunk of high quality, biodiverse bush within a finite reserve can have only one outcome; the death of species as space and food sources shrink. The long term separation of Manly Dam from Garigal National Park during construction will likewise reduce the range of animals and their access to food and shelter. Once the road is

complete the proposed wildlife underpasses will fail to ensure the safe movement of most species and, therefore, will fail to keep protect genetic diversity across the two bush reserves . Wildlife tunnel put some animals at risk of predation. Larger animals, especially macropods, are reluctant to use dark tunnels. There has been a long term campaign for a substantial wooded over pass to link Manly Dam Reserve with Garigal National Park, independent of the tunnel planning. This must be a minimum requirement should the project go ahead

The EIS reports that Burnt Bridge Creek will be subject to a 79% loss of base flow during construction and up to a 96% loss of base flow over the long term. This means it will become incapable of supporting tall leafy trees and riparian bushland and all the wildlife that relies on this corridor. The EIS say the creek is ‘a **vital ecological corridor**...that provides a range of important habitats for a diversity of local flora and fauna’ - *EIS, Appendix O, pg 45*. Yet, there is no plan put forward for saving it from collapse. The Northern Beaches Council, which looks after the Burnt Bridge Creek Nature Reserve says: “**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. Such profound environmental costs warrant rethinking the tunnel.

Middle Harbour is also at risk. The tunnel will pass under Middle Harbour in what is effectively an underwater bridge. The bridge will be supported on four pylons. Building these pylons will take several years and displace mud on the sea floor, which is confirmed in the EIS to contain contaminated sediments at risk of dispersal during the construction. The technology used to build the pylons is outdated and better solutions are available that would enable the supports to be built offsite causing less impact on the environment, on traffic and the lives of people in the area.

NSW climate change goals

The Beaches Link tunnel contradicts the NSW Government’s commitment to zero emissions by 2050. The construction of the tunnel will generate an additional 1,521,365 t CO₂-e to our greenhouse gas emissions (see EIS, Appendix X, pg v.). The project will promote a private and truck based model of transport while petrol and diesel continue to dominate due to the absence of measure to promote electric vehicles in Australia and extremely slow uptake and infrastructure development. Despite community campaigns in early planning stages and promises by politicians the tunnel does not have a dedicated public transport, locking in higher emissions from numerous private vehicles. The construction emissions alone are equivalent to 5.4% of annual NSW’s transport emissions – and will achieve only a projected 10% reduction in traffic along Military Rd.

More traffic congestion not less for the northern beaches

The much-advertised savings in commuting times must be considered in relation to local congestion and slower travel times on local roads, both during and after construction, as shown in the EIS. TfNSW acknowledges that traffic congestion in Manly Vale and Balgowlah will increase significantly during construction and once the tunnel is built. This means that for many local residents the tunnel is all pain and no gain, as any improvement in travel times in the tunnel will be cancelled out by clogged local roads. TfNSW advertising material fails to mention cars coming the other way, into the northern beaches. We already have serious congestion on weekends. While I believe the beaches should be shared, a private car model of transport just dumps tens of thousands of cars into the beach zone where parking is already limited.

Emissions

The EIS claims only 'negligible' increases in emissions from the exhaust stacks, yet the data used to establish background air quality does not come from the immediate site but is measured against a general Sydney level. New air quality modelling must be done that shows exactly how every site around the stacks will be impacted. The State Parliamentary Inquiry into Westconnex (2018) included recommendations that 'the NSW Government install, on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted'. The EIS confirms unfiltered stack will be situated very close to schools, shops, workplaces and homes. This is wrong for this tunnel, and for every tunnel already operating in Sydney.

Long term, acute impacts on local communities

Given the past experience of major infrastructure projects in Sydney, the Beaches Link is unlikely to be completed on time or on budget. West Connex, for example, was expected to take eight years, but actually took 10 years and the cost rose from \$10 billion to \$16.8 billion, during which time almost 2,000 complaints were received from the community. This project will situate a huge construction site – with many high risks of dust, noise and contamination – immediately across the road from a major high school. Given the long terms build, many students will spend all six years of high school in a highly disrupted environment. The impacts of noise, truck movements and vibration will be felt right across Seaforth and Balgowlah and will have a domino effect on congestion elsewhere.

These are only a handful of the many issues that concern me. I do not support the Beaches Link tunnel, and I would not use the tunnel. The project as presented in the EIS is not justified when considered against the extremely high cost to the community, the environment and NSW taxpayers.