Beaches Link Tunnel Project: Tips for Residents' Submissions to the EIS

***Note**: This assumes that the Beaches Link Tunnel is being assessed on a stand-alone basis and not combined with the Western Harbour Tunnel and Warringah Freeway Upgrade*

The following is a list of items that we have found particularly important in our analysis of the EIS documents. These and other aspects are also detailed on our website.

The points you make in your submission to the EIS are entirely up to you – you may agree with only some, none, or all of the points we make below, and choose to include whichever items you like in your submission. Of course, you can also add your own points.

It is very important that you write your submission in your own words, not by simply "copy and paste" from information provided here or on the website. This is because multiple "copy and paste" submissions are only counted as one submission by the Dept of Planning.

However, you might like to copy a section and move sentences around, delete some, write your own as well – as long as you make your points in your own style.

Key words on each topic are mentioned in blue for you to shape your submission wording around.

We would like to re-iterate that if you have any objections to the project, you must click the option for "**I object to the project**" on the Dept of Planning website when you make your submission. It does not necessarily mean you object to the whole project, just some aspects.

You might like to start your submission by saying "I object to the Beaches Link tunnel because….". Saying this will make it really clear that you object, and you can then elaborate on your reasons.

General ideas and methods to frame your response

It is useful to refer back to the goals stated in the EIS documents, and then say why you think those goals are not achieved.

Does the tunnel aim to relive traffic congestion and delays? Go on to explain why it does not. Does the tunnel improve public transport performance and usage? Explain how it does not.

For other issues such as impacts of construction, you may want to ask that aspects are conditional to the approval of the tunnel. For example, "noise impacts must be reduced by…. as a condition of approval", or "damage to the environment must be eliminated by implementing….. as a condition of approval".

Gains here will ensure protections are implemented before the tunnel decision is made, instead of just letting the contractor have control, or "winging it" during construction.

High Level Economic and Strategic Issues

Claims that in 2037 the time savings for drivers from (e.g.) Brookvale and Balgowlah will save 30+ minutes to drive to the city, the airport and beyond when it currently takes less than 35 minutes to drive from Balgowlah to the City.

These claims assume a number of vehicles that have been forecast/modelled to be driven to the city and beyond. These forecasts were made in 2016 for traffic flows 21 years into the future. There is plenty of evidence that traffic forecasts that far into the future are very difficult to make and the confidence level around these forecasts is wide and subject to challenge.

If these forecasts are wrong, the claim for time savings is wrong and the $-value benefit in the Benefit Cost Analysis (together with the Benefit Cost Ratio) will be wrong. In addition, the value of the toll revenue for the operator will be wrong – as will the amount an investor in the tunnel is prepared to pay the government.

The vehicle flow forecasts for 2037 were made without considering:

- Taking into account the Dee Why to Chatswood Express Bus Service (or a B-Line Service) that commenced service in January 2020.
- The move to Work-from-Home (WFH) that has developed with the introduction of a range of restrictions to control the spread of COVID-19. TfNSW have evaluated the movement to WFH effect as "temporary".
  There is plenty of evidence that WFH in one form or another will be a permanent feature in society. At present, approximately 52% of workers on the Northern Beaches do not travel outside the Northern Beaches for their work. With the wider adoption of WFH and the establishment of WFH Hubs, this rate could increase to 80% - as residents whose traditional place of employment is outside the northern beaches work from home 2-5 days per week. A number of large employers (including TfNSW itself and many government departments) have officially adopted a hybrid form of WFH.
- If the government decides to proceed with the Beaches Link project, there is expected to be a rapid adoption of WFH because of the construction itself - increased congestion in Manly Vale and along Sydney Road due to the construction activities in the Burnt Bridge Creek Deviation and on the Balgowlah golf course site. Moves to WFH during this period will become more permanent, as will the establishment of profitable WFH Hubs in and around Manly – further reducing the number of vehicles needing to travel to the city (and beyond), particularly during the AM peak.

The EIS states: "Ongoing and continuous traffic surveys carried out by Transport for NSW indicate that the 2016 baseline year is appropriate for modelling purposes as there is little

material difference between 2016 and existing (2020) traffic conditions in the project area." (EIS Chapter 9 Transport page 7). Whilst private vehicle traffic has returned to approximately 90% of pre-COVID19 levels, public transport is down 40-50% (from Opal card data) – showing the number of commuters has decreased significantly, despite the health risk diminishing.

Claims that traffic along Military Road will be reduced once the tunnel has been completed.

The EIS states that according to traffic modelling, the traffic along Military Road will fall by 11% once the tunnel project is completed. If the traffic volume forecast for 2037 are wrong (i.e. too high), the claim of a relatively small reduction in traffic along Military Road of 11% will be too high – and reduction in traffic will be less than 10%.

It is therefore likely that the implied claim by TfNSW that residents in Mosman and Cremorne will experience a major/dramatic reduction in traffic is wrong, and hence does not align with the stated objective for the project.

Conclusion for traffic modelling and project need

Based on a realistic forecast of traffic volumes for 2017, it will be established that this very expensive infrastructure project (in its current form) is not necessary. The money could be better spent in expanding the very popular bus transport options and establishing community WFH Hubs that have the potential of improving active transport in the northern beaches and the amenity for so many residents.

Evaluation of different scenarios for project comparisons

Beaches Link EIS, Chapter 3, Section 3.4 states: "The Western Harbour Tunnel and Warringah Freeway Upgrade project and the Beaches Link and Gore Hill Freeway Connection project are being delivered as separate projects, but have been developed as an integrated program of works known as the Western Harbour Tunnel and Beaches Link program."

The evaluation of different scenarios in the EIS includes options for "Do nothing", "Do something" (the Beaches Link, but not Western Harbour Tunnel), and "Do something cumulative" (the Beaches Link tunnel and Western Harbour Tunnel). As stated in Chapter 3, and as the Western Harbour Tunnel has been approved, the "Do something" scenario (without WHT) is not relevant. The EIS process did not include evaluation of a scenario of Western Harbour Tunnel, but no Beaches Link. This is the most realistic option, taking into account traffic movements to and from the Northern Beaches end at traffic congestion on the Warringah Freeway. TfNSW cannot claim the Beaches Link is a necessary piece of infrastructure without full evaluation of the option of Western Harbour Tunnel but not Beaches Link.

Evaluation of public transport options

Public transport options as an alternative to the Beaches Link tunnel are dealt with very briefly in the EIS documents.

The EIS, Chapter 4 (page 4-12) states "without measures to improve journey times by increasing the road efficiency or capacity, the addition of more buses to the network can contribute to congestion." What expert transport planner would reduce the options down to such a simplistic conclusion "more buses = more congestion"?

We know real consideration of public transport options was not considered prior to the commencement of the concept stage - as revealed in NSW government cabinet documents leaked to the media. This must be conducted via an independent cost-benefit analysis for all transport options and publicly released.

Validity of Community Consultation

The Beaches Link EIS, Chapter 7, details the community consultation so far, and describes what a great job they have been doing – including providing all information to stakeholders in a timely, accurate manner, and providing adequate opportunities for the community to have their questions answered.

Interestingly, they detail community consultation from 2018 with 232 expressing dissatisfaction with the community consultation process, 184 submissions supporting the project, and 2243 opposing.

We have made several approaches to TfNSW describing the issues the community has had in accessing the EIS online, and limited opportunities to have questions answered. Requests for face-to-face sessions in small settings adhering to COVID-safe practices were rejected, as were requests for an extension to the EIS submission period.

During a recent TfNSW Virtual Information Session, a method advertised as a way to have community questions answered, only 43% of questions received any response – with many of those being limited in detail, either saying "we may speak about that issue later in the session" or just referring to a chapter in the EIS.

Community consultation has been inadequate for the purposes of the EIS process. It should not be up to TfNSW to assess their own performance, but an independent assessment speaking to all stakeholders and the community.

Destruction of High Value Bushland and Green Open Space

Here are some examples of the environmental damage that will come as a consequence of building the Beaches Link Tunnel project:

- Groundwater flows into the Burnt Bridge Creek will be reduced by around 80% 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 vegetation along the creek (and including the valuable Baringa Bush Reserve), the grey-headed flying fox colony, and on 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 fall – and during times of reduced rainfall the water will be polluted.
- The grey-headed flying fox colony are presumed not to be impacted by noise because they currently live next to a busy road. The EIS states that when noisy roadworks occur 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' behavious will be employed to assess impacts on the colony, but this is of unknown regularity or time of assessment.

- 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.
  This includes Sydney Water site (Bantry Bay Reservoirs) at Kirkwood Avenue, as it cleared, "grubbed" and transformed into a construction site. This land was saved at the 11th hour by the community from being sold off to developers 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. Another threatened species mentioned in their report was the Eastern Bent-wing bat - which was notably absent from the species listed in the Beaches Link EIS.
  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.

Construction Pollution to Waterways

Toxic Sediment and Sludge from the Coffer Dams and the Installation of the Immersed Tubes in Middle Harbour

The disturbance of sludge on the bottom of Middle Harbour (in fact at one of the deepest parts of Sydney Harbour) presents a major problem for communities that spend time in Middle Harbour, Spit Marina, Sandy Bay and Clontarf Beach and Children's Ocean Pool.

The tide will carry the sludge towards Spit Bridge and beyond – with potentially high levels of very nasty toxins in the waters of Sandy Bay and in the Clontarf Ocean Pool.

The control of sediment, silt and sludge by means of floating curtains around the construction site in Middle Harbour is a serious challenge – and the contractor will not be able to provide a guarantee that the levels of toxins in the waters of Sandy Bay and Clontarf Beach will be within safe levels.

We believe that the risks for the community are unacceptable.

Polluted Water in Manly Dam

Polluted water will flow into Manly Dam from two sources:

- The wastewater treatment plant next to the water tanks that will be operated as part of the Seaforth Construction Site. Water from the Wastewater Treatment Plant and dirty run-of from the construction site will be channelled through what is left of adjoining bushland within the park, into a small pond on the Wakehurst Golf Course. Much of the sludge and siltation will eventually flow into Manly Dam because the small pond can be expected to overflow regularly – resulting in significant pollution in Manly Dam during regular heavy rain events.

- The widening of Wakehurst Parkway will result uncontrolled flows of water during periods of heavy rain. The ruts resulting from the construction activity on the ridges and slopes as part of the bush clearing and the construction activity will result in the flow of polluted water in the catchment area of Manly Dam and into Bantry Bay. In the EIS, the TfNSW even admits that it cannot control this happening when it rains heavily. For example, in 2020 this would have happened every month.

The likely loss of Water Quality in Manly Dam and it's catchments is likely to wipe out the population of Gondwanan Climbing Galaxias fish in Curl Curl creek (Manly Creek) thought to have existed for 60 million years. They are the only population in Sydney. The impact assessment in the EIS determined that " taxa (biodiversity) in these sections of the catchment are pollution tolerant". Nothing could be further from the truth!

In Northern Beaches Council's draft EIS response (page 39) it says "its loss would represent a range contraction". It also says "Council would have significant concerns about any decrease to water quality in Manly Creek". This means that Manly Dam might have to be closed to all forms of human water recreation too.

In our submissions, we should ask for better control measures, systems to monitor pollution levels (and if they rise, mechanisms to find and stop the source of pollution) and guarantees that waterways do not become polluted.

Local traffic impacts

Rat Runs through Balgowlah

Even TfNSW acknowledges that traffic congestion in Manly Vale and Balgowlah will increase significantly during construction and once the tunnel is built. However, it simply says that this is a problem for the Council to sort out.

The submission council is making to the EIS includes requests for TfNSW to include upgrades to local roads and intersections that council knows 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 streets
- 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/Rosebery 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 (you thought the 2 years they just went through were enough? No, more will be needed) – widening Frenchs Forest Rd outside hospital with 24hr bus lane, widening Forest Way, upgrades to Grace Ave, 3-4 new traffic lights.

So this is the amount of local road changes that they are expecting that will be needed from the development of Frenchs Forest, and the increased traffic trying to find it's way to the tunnel.

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 be rejected out of the funding for the Beaches Link tunnel, but even if approved, it will just move the bottleneck along to the next intersection.

Construction impacts – Important for areas directly impacted

Many thousands of residents will be subject to excess noise and vibration from the construction of the project, including potential damage to homes. The EIS provides no exact information on the mitigation measures that will be put in place to prevent this, but

residents should be untitled to know as a condition of approving the project. Of course some disruption is going to happen, but it is about providing adequate protections for residents.
The recent parliamentary inquiry into the construction of WestConnex Stage 1 and 2 found many examples of contractor breaches of the rules, relying upon resident reporting and complaints.
https://www.parliament.nsw.gov.au/lcdocs/inquiries/2497/Final%20report%20-%20Impact%20of%20the%20WestConnex%20Project%20-%20FINAL%20-%2014%20December%202018.pdf
They report Finding 14 "That the various noise mitigation measures offered by Roads and Maritime Services are wholly inadequate to substantially reduce heavy construction noise."
What are the protections to ensure the Northern Beaches community does not suffer the same fate? Are they sufficient?

Standard Construction Hours

Standard construction hours will be 7am-6pm weekdays and 8am-1pm Saturdays, with night work conducted "when required". The community should be informed the full list of conditions that determine when night work can be conducted, and not to be left to the discretion of the contractor at the time. This should include any construction activities within the site boundaries.
Bearing in mind the increasing number of people working from home, and construction sites proximity to schools, there are many more people near construction sites during the day. Consideration should be given to restrict types of work within standard construction hours – ensuring loud activities are conducted only at appropriate times when school students are absent, and daily respite times to noise, vibration and truck movements (beyond minimising truck movements during peak traffic times). These restrictions should be developed from real consultation with the community, not determined by the contractors.

Truck movements

The EIS does not detail a lot about the directions that trucks will move once they have left construction sites. In many circumstances, the trucks will travel in the direction tunnel spoil needs to go, and could be in north, west, or south Sydney. There are no guarantees that tunnel spoil trucks will not travel on local roads in great numbers. One such example is Frenchs Forest Rd, Seaforth, where the gradient and curve in the road makes it a dangerous section for pedestrians and other road users.
Restrictions must be placed on the volume and timings of truck movements carrying spoil that ensures local streets are not impacted.

Tunnelling works conducted 24/7

Understanding that tunnelling works continue 24/7, the community should demand that no tunnelling works are to be conducted outside acoustic sheds outside standard construction hours. There should be no exceptions to this condition based on timeline, cost or machinery used, but could have exceptions to ensure safety to the construction workforce.

Construction noise mitigation

The methods used to mitigate construction noise (such as noise walls) are not fully dealt with in the EIS - they just say they will arrange mitigation later. The community should have more information and confidence in these strategies, rather than just being told "we'll sort it out later".
The EIS Chapter 10 (page 10-12 to 14) talks about "reasonable and feasible" noise mitigation - based on the Noise Policy for Industry (NSW EPA, 2017a). Whilst the need, likely benefit, social and environmental effects are all considered when evaluating whether a particular noise mitigation should be used, so is cost. The community should know who decides whether something is too expensive to implement? Decisions such as these need to be made by an independent arbitrator who consults with all parties including the community, not just TfNSW or the contractor.

As a condition of approval of the project, an independent assessment of noise and vibration impacts from construction on all surrounding homes with noise and vibration above management levels must be done and provided to property owners before construction commences. Where exceedances are found to be likely, appropriate mitigation strategies such as double-glazing or noise barriers to eliminate these exceedances must be implemented before construction. Where exceedances cannot be eliminated, negotiation between the resident and TfNSW must be undertaken and if an agreement cannot be found, alternative construction methods must be undertaken.

Numerous examples can be provided on similar projects of contractors breaking restrictions during construction, and it relies on residents to report these breaches. It is too much to expect residents to monitor worksites – TfNSW must be responsible for monitoring contractor compliance, with appropriate penalties for breaches.

Balgowlah site access road and Balgowlah Oval

Construction of the access road through Balgowlah golf course will occur early in the process of construction, and TfNSW states that Balgowlah Oval will remain operational through the whole construction phase. The EIS does conceed that the oval would have diminished appeal of use during this time.
The community has noted that the access road as planned is placed within a metre of the edge of the oval, and in the footprint of the existing cricket nets – this would make the oval unsafe and unusable during the period.

The access road must be placed at least 15 metres further west of it's current position, ensuring safe use of the oval during construction. Trees surrounding the oval to the west and north must also be retained to improve the appeal of use of the oval over the lengthy period of construction.

The access road will also be used by the majority of construction traffic, and by general traffic accessing Sydney Rd when the tunnel is operational. Many homes overlook the site and will be impacted by increased light and noise from traffic.

The community asks that the design of the access road be sunken into the slope of the terrain, which will need to be terraced during construction and rehabilitation of the site. A sunken access road will provide significantly more protection for residents from light and noise impacts, for potentially lower costs than other mitigation strategies.

Construction worker car parking

Whilst the EIS states the car parking for construction workers will be provided on site in Balgowlah, and workers would be encouraged to use public transport or shuttle buses. However, experience on other similar projects has found that worker car parking is universally a problem, with large numbers of workers parking on local streets.

For example, the EIS Appendix F, Part 1 (page 176) states that despite removal of the golf club car park, "alternative parking is available on Pickworth Avenue, impacts would be negligible". Locals know that Pickworth Ave parking is regularly full, particularly when Balgowlah Oval is being used. This adds to the pressure of parking in the local area.

Guarantees need to be provided to ensure workers are not permitted to park in local streets, without being reliant on council to enforce local parking restrictions.

Tree removal

Part of the EIS includes a full analysis of all trees impacted by the construction individually, and numbers each tree. This is detailed in Appendix W Part 2 (page 1 onwards), with trees to be removed indicated in purple, and those potentially impacted in yellow. Are there trees subject to removal near your home? Do they really need to remove these trees?

Established mature trees can do a lot to protect residents' visual amenity and light pollution, as well as some noise protection.
Beaches Link EIS Appendix V, page 160, talks about light impacts in the area east of Balgowlah Golf course as having "High night time visual impacts" both during construction and when operational. Other areas have significant light exposures too.

If a tree is "To be retained", they have to plan vehicle movements / digging to avoid it, and to put protective collars around them if needed – all to look after them. If a particular tree, or line of trees is important to your home, ask for the relevant tree numbers to be categorised as "To be retained" (particularly if they are of high retention value). This should be justified as part of mitigation measures from noise, pollution and light impacts and for protection of visual amenity. This is particularly important if the topography of the site means your home is elevated and no other mitigations are available.

Air Quality

Unfiltered Ventilation Stacks in Balgowlah, Seaforth, Cammeray and Artarmon

The government refuses to consider having filtration in the ventilation stack that is so close to Bally Boys, St Cecilias and Seaforth Public Schools in Balgowlah, and Anzac Park Primary School in Cammeray amongst others. In the EIS, there are thousands of pages of very technical information that is supposed to justify their decision not to install filtration.

We can summarise their reasons as follows*: In the view of the medical experts (through the NSW Chief Medical Officer and the technical experts on air flow from ventilation stacks) there will definitely be an increase in the level of air toxins in the atmosphere close to the stacks (1.2 km and below), but the "modelling" tells the experts that not enough people will die as a result of the increase in air toxins to justify the expenditure on filtration to justify the additional expense on installing filtration in order to reduce those additional deaths.*

There are flaws with the modelling as it is based on averaged figures across large time periods (i.e. 24 hours) and insufficient emphasis placed on the exposure peaks when traffic is travelling in the relevant direction. For example, the shortest exposure period modelled for PM10 is 24 hours – combining late night periods of low traffic with peak periods.

Ultimately, the tunnel project will increase levels of a variety of pollutants for schools and residents - for which there is no safe level of exposure according to health experts, yet the EIS says it is safe.

You can make your own judgement.

Items not to include in your submission, but to consider

Over-Development in the Northern Beaches

In any submission to the EIS, it is pointless to raise this issue, because it is not part of the EIS. Our raising the issue is to motivate and incentivise you to lodge a submission that focusses on what you believe to be wrong about the project, despite the assurances in the EIS that problems will be minimised.

James Griffin and Brad Hazzard have assured us that the Government does not intend to use the Beaches Link Tunnel to justify mass rezonings to allow rapid development of medium density residences. They claim that the Beaches Link Tunnel is "catch-up infrastructure". This is wrong.

Northern Beaches Council's draft EIS submission states that some of the reasons why they support the tunnel is to allow future growth, to unlock Phase 2 and 3 of development in Frenchs Forest (turning the population there from approx 5,000 to 30,000), and to support additional growth in Brookvale.

Why would the main tunnel be six lanes wide – when a tunnel like NorthConnex is only 4 lanes wide, and will carry much more traffic? The Beaches Link Tunnel goes to a dead-end. All other tunnels in Sydney take traffic into or around parts of Sydney – none go to a dead-end.

The reason why the government will "allow" over-development in the northern beaches is that the overall cost of building the Beaches Link Tunnel is going to be massive ($10 billion in $2017, but closer to $20 billion in $-of-the-day once the project has been completed) and the best it can expect from an investor in the project is likely to be $5 - $6 billion. The subsidy gap (more than $10 billion) needs to be recouped somehow.

Weekend Traffic in Manly in the Summer

Just like the issue of over-development in the northern beaches, it is pointless to raise this issue as well. TfNSW and the DPIE are not concerned about the problems resulting from the massive influx of visitors to Manly in summer, once the Beaches Link Tunnel has been built.

The Beaches Link Tunnel project has been sold to the residents of the northern beaches on the basis that "it will save 30+ minutes to get to the city you will avoid 19+ sets of traffic lights". The same applies to residents in Western Sydney who will now find that it is quicker to drive to the northern beaches than to drive to Bondi, Coogee or Cronulla.

If you think it is difficult to find a park close to Clontarf Reserve, Little Manly Beach, Queenscliff Beach or Freshwater Beach in the summer, just wait until the tunnel is built.

In Conclusion

- The Beaches Link Tunnel is proposed to solve a long term problem that will not exist because of changes to the work/life balance following the broader adoption of Work-from-Home (WFH) and investment in WFH Hubs in the northern beaches.
  Fewer people will need or want to drive to the city (and beyond) during the morning peak.
  Many will drive to the office on the days they are required during non-peak times.
  As a consequence, there will be a big reduction in the peak morning traffic flow.
- Having more residents in the northern beaches working from home, presents opportunities to increase local public transport options and active transport possibilities like walking and bike riding.
- Despite the overall reduction of commuter traffic, induced demand and funnelling effects will result in more congestion and longer delays on local roads around the tunnel entrances, eliminating travel time savings in the tunnel.
- The Beaches Link Tunnel will have a disastrous impact on the lifestyle of residents and during the construction phase and cause long term irreparable damage to our precious environment and green spaces.

It is up to you to lodge a submission to the EIS.