

Submission  
No 393

## INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

**Organisation:** St Cecilia's Catholic school Advisory Committee

**Date Received:** 17 June 2021

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The Hon. Daniel Mookhey MLC  
Chair  
Public Works Committee  
NSW Legislative Council  
Parliament House  
Macquarie Street  
SYDNEY NSW 2000

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<https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2767#tab-submissions>

Dear Hon. Mookhey,

**St Cecilia's Catholic Primary School- SUBMISSION TO NSW LEGISLATIVE COUNCIL INQUIRY INTO THE IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK**

**1 Introduction**

The Public Works Committee is inquiring into the impact of the Western Harbour Tunnel and Beaches Link.

We are the representatives of the Advisory Committee at St Cecilia's Catholic Primary School in Balgowlah. We note that the Catholic Schools Office for Broken Bay endorses this objection and will be working with us and St Kieran's Catholic Primary School to ensure the issues identified are addressed. As well, the Parish of St Cecilia's is also involved in this process and will continue to separately engage on the proposed tunnel.

Our objective is to continue to ensure the safety, health and well-being of all St Cecilia's school children. We have more than 270 children (aged between **4 and 12**) and over 25 caring and committed staff who work at our school between the hours of 7am and 6pm, Monday to Friday.

Our school community is very concerned as to the negative direct and indirect impacts the construction and operation of the Beaches Link Project will impose on the School, its pupils and its staff. Members of our Committee have been involved in reviewing and writing submissions to the various stages of the design and planning process to date.

The following Terms of Reference of the Inquiry are addressed in this submission:

- (f) the consultation methods and effectiveness, both with affected communities and stakeholders,

- (k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally, and
- (l) the impact of the project on nearby public sites.

## 2. Background

The school is located on a small property bordered by Seaview Street, White Street and Wanganella Street, Balgowlah. It is 215 meters south-east of the proposed Balgowlah Golf Course Construction Site [BL10] and access road as outlined in the EIS.

St Cecilia's will be significantly adversely affected by the construction and operation of the Beaches Link.

The expected adverse impacts cover both the short to long term construction and operational phases of the proposed works. Expected key impacts include:

- Wind carrying pollution and dust during and post construction– 17% of our children suffer from asthma;
- Noise from construction;
- Loss of access to use Balgowlah Oval due to the unacceptable health and safety risks to which the children would be exposed;
- 30+ trucks causing gridlock waiting in nearby roads causing traffic chaos;
- Expected rat runs on the three streets that border the school refer to red arrows in Fig. 1 above which increases our safety concerns for the children;
- No safe levels of exposure to dangerous air quality particulates stemming from the unfiltered ventilation stack located in the Balgowlah valley emanating from the tunnel and increased traffic, vehicles and congestion on the surrounding roads.

Our concerns are intensified from review of the EIS due to:

1. the extra additional lane added to in the modified link road design;
2. the closure of the Sydney Road end of Maretimo Street junction; and
3. diagrams of the ventilation stack indicating its location nearer to our school.

## 3. Terms of reference f) the consultation methods and effectiveness, both with affected communities and stakeholders

**EIS public exhibition period-** The EIS public exhibition period of 9 December 2020-1 March 2021 largely coincided with the end of the school year in 2020, the summer school holidays, the two-week COVID lockdown of the Northern Beaches in December-January, and the beginning of the school year in 2021. During this time, our Advisory committee only met once on **24th February 2021**. The public exhibition period did not allow parent volunteers time to scrutinise the EIS documents in detail. We requested an extension to the submission period with other local schools from the Premier of NSW and the Minister for Transport to allow sufficient time to analyse the 12,000 page EIS in more detail, but that extension was not forthcoming before the closing date for submissions to the EIS.

**First submission-** Prior to the EIS public exhibition, we had written a submission (attached as **appendix 1**) to the first review process in August 2018 as a key sensitive receiver. It is extremely unsatisfactory that until the time of writing this letter to you, we have never received a response to this submission. We note the comments outlined in such submission remain current and unanswered.

**EIS Critical Omission-** Despite being a key sensitive receiver, in the detail of the EIS the school was incorrectly characterised as solely a *place of worship* and not a *school*. We occupy a dual site with St Cecilia's Catholic Church. We requested that assessment noise forecast impact calculations be updated to include the site as a school as well as inclusion as a receiver building for vibration intensive work due to our location being <200m from the construction site boundary. We attach our detailed EIS submission as **appendix 2**.

**Terms of reference (k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally, and (l) the impact of the project on nearby public sites.**

We attach as responses to these terms of reference in the appendix; our original submissions which outline our continuing concerns as to the adequacy of the assessment processes as to impacts on our school and public sites.

There are two documents:

**Appendix 1** "Submission regarding Project Update for the Beaches Link Tunnel (August 2018): which outlines our concerns with regards the construction phase namely; noise, dust and vibration impacts, loss of access to green space and traffic and road safety impacts and in the operational phase namely traffic management and pedestrian safety and air pollution and health concerns.

**Appendix 2** – "St Cecilia's Catholic Primary School - Submission to Beaches Link Project Environmental Impact Statement ("EIS")" : Objection; which outlines our proposed mitigation measures to these impacts and concerns with regards the construction phase namely; noise, dust and vibration impacts, loss of access to green space and traffic and road safety impacts and in the operational phase namely traffic management and pedestrian safety and air pollution and health concerns.

It is important to note that as parent volunteers and school staff we are not in a position to quantify all of the potential impacts of the proposal on the school. We do not have the funds or professional expertise to ensure our objective of student safety and well-being will be met. Also, it is difficult to foresee all the adverse impacts a project of this nature will have. Therefore, we would kindly request that the NSW Government fund a Project Manager to represent the school's interests and ensure that all mitigating measures are complied with to minimise impacts of the proposal on the school. We have also outlined mitigation measures for the impacts we can foresee but we expect other unknown issues to arise and would like the opportunity to request and negotiate additional measures.

## **Conclusion**

In summary, the St Cecilia's Catholic school Advisory committee is grateful for the opportunity to ensure that the Parliamentary Committee is aware of our serious concerns about the impacts of the Western Harbour Tunnel and Beaches Link.

We wish to ensure that the short- and long-term health (both physical and mental), amenity and continued high level of education for current and future students is not compromised owing to the construction and operation of the proposed Beaches Link Tunnel.

Please contact us if you require any further information.

Yours sincerely,

**Chris Bignold**

St Cecilia's Advisory Committee

Chairman

**Sonia Walsh**

St Cecilia's Advisory  
Committee

**Fran Taylor**

Principal St Cecilia's Balgowlah Catholic school

## Appendix 1- Beaches Link Design Phase submission August 2018

### IMPACTS OF THE PROPOSED FOUR LANE LINK ROAD ON ST CECILIA'S

#### Submission regarding Project Update for the Beaches Link Tunnel (August 2018)

##### 1. INTRODUCTION

This submission is written by the St Cecilia's Advisory Committee. The student population - consisting of children from 4 to 12 years of age - is expected to increase to 295 in 2019, and approximately 50 of these children attend morning and after school care, which is held at the school starting from 7am and finishing at 6pm Monday to Friday.

The Government of NSW and its statutory departments have an overriding duty of care owed to the community to methodically assess all options to address traffic flows and population density with minimal adverse impact to health and well-being and destruction of local amenities and green spaces whilst adhering to global best practice. This is especially the case, as we are writing on behalf of the children, both current and future students of St Cecilia's who do not have a voice to raise the very serious concerns relating to their safety, health and well-being that this current proposal will have on their enjoyment of school life, learning and their health. Moreover, we believe that admission rates at St Cecilia's will greatly diminish given parent's concerns over poor air quality from the unfiltered stacks of the Beaches Link tunnel.

The school is located in on a small property bordered by Seaview Street, White Street and Wanganella Street, Balgowlah (refer Figure 1 below). It is 215 meters south-east of the proposed Link Road.

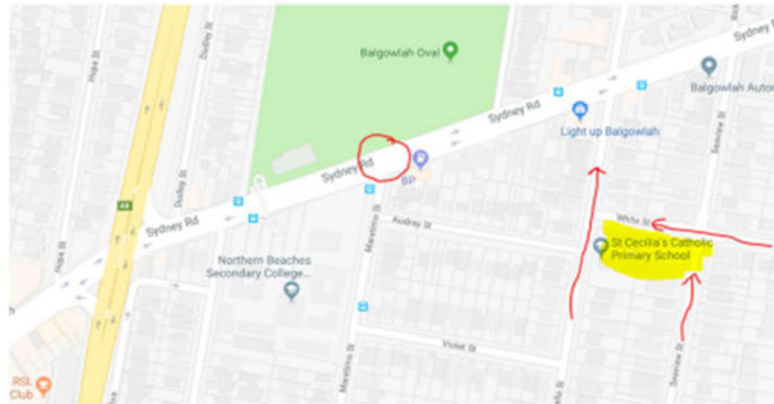


Figure 1: Location of St Cecilia's Catholic Primary School

St Cecilia's will be significantly adversely affected by the construction and operation of the proposed four-lane link road between Sydney Road and the Burnt Bridge Creek Deviation entry/exit tunnel through Balgowlah Golf Course, as shown by the red circle in Fig. 1 above. The red arrows are the expected 'rat runs' that will border 3 sides of the primary school.

The expected adverse impacts cover both the short to long term construction and operational phases of the proposed works.

Expected key impacts include:

- Wind carrying pollution and dust during and post construction– 17% of our children suffer from asthma;
- Noise from construction;
- Loss of being able to use Balgowlah Oval due to the unacceptable health and safety risks to which the children would be exposed;
- 30+ trucks causing gridlock waiting in nearby roads causing traffic chaos;
- Expected rat runs on the three streets that border the school refer to red arrows in Fig. 1 above which increases our safety concerns for the children;
- No safe levels of exposure to dangerous air quality particulates stemming from the unfiltered ventilation stack located in the Balgowlah valley emanating from a 7km tunnel and increased traffic, vehicles and congestion on the surrounding roads.

If the Balgowlah Interchange and link road as described in the Beaches Link Project Update – August 2018 proceeds, the impacts of the proposal on the students, staff and parents of the school during construction and operation of the four-lane link road are detailed below.

## **2.1 Construction**

### **Noise, dust and vibration impacts**

Construction of the four-lane link road, use of Balgowlah Golf Course as a temporary construction site, 30+ truck movements a day and changes to the Sydney Road-link road intersection will result in noise, vibration and dust/pollution impacts on the school and our children and teachers.

Of our current 280 students 17% suffer from asthma. Parents are particularly concerned about air quality and pollution from construction. There are no safe levels of exposure to particulate matter and children are especially vulnerable to disease caused by such poison.

The school does not have any indoor gymnasium and each day the children are outside in the playground at the following times:

- a. from the time they arrive at the school each morning (normally 30min prior to school starting) until after the daily whole of school assembly (which is held in the outside playground from 8.50am until about 9.05am);
- b. recess 30min;
- c. lunch 50min;
- d. physical education classes – 60min per week; and
- e. after 3.15pm until they are collected by their parents / carers.

In addition, children who attend before and after school care arrive at school from 7am and often don't leave until 6pm (i.e. an 11 hour day).

All of these activities will be adversely affected by noise and pollution. During the school day there is concern the children will be affected by the noise from trucks coming and going and idling while parked and other construction noise all of which will disrupt their learning.

Subject to the current Beaches link being properly assessed on the best options for the local area, St Cecilia's parent body request, at the very least that the data from air monitoring devices be provided to the school for distribution to the parent body for at least the first 24 months of construction and then again for the first 12 months of operation and be assessed against Global best practice quality levels, particularly with respect to children's exposure levels.

Further, we request that the RMS provide a pre-determined plan to be agreed with the school specifying what actions will be taken by the RMS should the reported air quality be recorded as being below the specified safety levels.

#### **Loss of access to green space**

Balgowlah Oval, located across Sydney Road to the north-west of the school, is an essential active open space for our children to use. Due to limited open space and the absence of any grass on the school grounds, St Cecilia's relies heavily on the use of the oval for school sport and lunch time play at least twice a week.

The Project Update for the Beaches Link Tunnel states that Balgowlah Oval will be upgraded as a result of constructing the link road. However, the close proximity of heavy construction vehicles as well as dust and noise from construction work would be a major health and safety concern for our children both accessing and using the oval during the construction phase. It is expected that Balgowlah Oval would no longer be a safe green space to access and we will be left without a green space within walking distance of the school.

With the proposed removal of much of the Balgowlah Golf course the parent body is again concerned at the excessive poor levels of air quality and traffic congestion that will be caused as a result for the link road being so close to the oval.

#### **Traffic and road safety impacts**

There will be heightened traffic congestion experienced on Sydney Road and adjoining streets including Wanganella, Seaview and White Streets during the construction phase.

The routes of trucks moving soil from the tunnel excavation and other construction materials to and from the construction site are not specified in the Beaches Link Project Update – August 2018. Children accessing the school on foot, by bicycle, by public buses and private vehicles, will experience traffic delays and reduced safety in the streets of the surrounding area.

We are particularly concerned around the expected 'rat runs' using White, Seaview and Wanganella Streets that will result from residents seeking to enter into Heaton Road to by-pass the construction on Sydney Road which will put our children's safety at risk - all three roads envelope St Cecilia's. Peak hour traffic which commences as early as 6.30am is around the time parents are dropping their children off at before school care which commences at 7am. The roads are choked and can barely accommodate safe



traffic movements today. They are made worse by buses using the roads by-passing parked cars or as was the case recently, a bus crashing into a parked car outside the school gates on Wanganella street causing damage to 3 parked vehicles.



The parent body feel there is already a lack of safety on the surrounding streets around St Cecilia's. Currently there are no safety flashing lights over the pedestrian crossings, no pedestrian crossing on Seaview Street nor 40km/h speed limit zones. We feel the safety of our children is already compromised as these basic safety initiatives have not yet been provided. We feel this will only be exacerbated on the commencement of construction.

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The St Cecilia's parent body would like to be consulted on the risk assessments conducted by the RMS on the traffic management controls during the construction phase.

## **2.2 Operation**

It is our understanding that the Balgowlah Boys P&F have successfully lobbied for vehicles to not be able to access the link road via Maretimo Street. *(Confirmed by James Griffin at a Community meeting on 11<sup>th</sup> Nov 2018)*

If the above is correct then the intersection of Sydney Road and Wanganella Street will be the point by which vehicles looking to avoid the congestion of Sydney Road will access the four-lane link road. It is expected that vehicles from Fairlight, Balgowlah Heights, Balgowlah and Clontarf will seek to access the link road via this junction, turning left off Wanganella street onto Sydney Road just prior to the opening of the link road.

This intersection, the corner of Sydney Road and Wanganella Street, is a major access point to St Cecilia's. Increased traffic brings serious concerns about traffic management and pedestrian safety.

### **Traffic management and pedestrian safety**

To alleviate concerns, parents need to be assured of the traffic management proposals of the RMS. To this end we request this be provided in consultation with the St Cecilia's parent body prior to any construction commencing.

It is to be noted that St Cecilia's has been requesting the RMS install flashing lights and reduced speed limits along Seaview, Wanganella and White streets since June 2018. Notwithstanding that flashing lights is a NSW government requirement for all schools within the state, we are yet to receive a response from the RMS to our repeated requests.

Flashing lights and a reduced 40km/h speed limit are required as a matter of urgency.

There is limited parking at the entrance to St Cecilia's on Seaview Street with residents and bus commuters using the majority of on-street parking. During the morning drop off and afternoon pick up White Street is used as a 'kiss and drop'. Cars are often banked up past the White Street / Seaview Street roundabout, with parents having to circle the block if their children are not ready for pick up. During these times there are cars coming and going causing major disruption to the flow of traffic.

Wanganella Street is used by Sydney Buses and parents who park to pick up school children.

The only traffic management control on Wanganella Street is a raised zebra crossing. Traffic delays are caused at the T junction of White and Wanganella Streets resulting from vehicles turning right off White street into Wanganella street, whilst vehicles are turning right off Wanganella street into White street, this is further exasperated by the traffic build up back to this T junction from the Wanganella/Sydney road traffic lights.

Parents also park in the narrow Audrey and Violet Streets to drop off and pick up children, and to attend school events both these streets are restricted to one way in morning peak traffic times. In addition, the parishioners of St Cecilia's Catholic church also use the adjoining streets for parking for religious services including funerals and other church related activities.

'Rat runs' will cause further congestion increasing the risk to the students and toddlers who often attend to pick up siblings.

### **Air pollution and health concerns**

In addition to air pollution from the exhausts of increased traffic on Wanganella, Seaview and White Streets, we are concerned that the tunnel ventilation outlet, located some 255 metres from the closest point of Balgowlah Oval and approx. 455 metres from the closest point to the school, will result in poorer air quality, breathing difficulties, disease and increased asthma cases experienced by our children.

RMS states in the Beaches Link Project Update – August 2018 that the unfiltered tunnel air will be ejected from an elevated ventilation outlet high into the atmosphere through buoyancy and speed, and will be diluted hundreds of times as it mixes with the surrounding air and becomes indistinguishable from background levels. Although RMS states that the tunnel operators will be required to meet air quality limits and the air quality will be monitored, we call on RMS to filter the tunnel air before it is ejected from the ventilation outlet as a mandatory requirement to address health and safety concerns particularly for small children.

As mentioned above St Cecilia's Parent body request data from the nearest air monitoring device be provided to the school for distribution to the parent body for the first 24 months of construction and then again for the first 12 months of operation.

Further, we request that the RMS provide a pre-determined plan of action that will be taken should the reported air quality be below the recommended levels.

### **3. CONCLUSION**

The St Cecilia's parent body does not support the proposed four lane link road outlined in the Beaches Link Project Update – August 2018 for the following reasons:

- The expected additional traffic congestion on roads that envelope St Cecilia's namely, Wanganella, White and Seaview streets and associated pedestrian safety concerns given that access to the link road will be through these narrow residential and school accessing streets;
- the lack of access to the Balgowlah oval for our school children during construction given health and safety risks;
- air pollution and health concerns for our children from both the close proximity of construction to the school and the unfiltered stacks during operation.

Further, we request that the Government and its statutory bodies address all viable options for transport in the local area rather than just what is being hastily put forward now. There is a duty of care owed to the public to keep it safe and minimise adverse impacts to health and well-being, particularly for young children in our school communities.

## **Appendix 2- St Cecilia's Catholic Primary School - Submission to Beaches Link Project Environmental Impact Statement ("EIS") : Objection March 2021**

**ST CECILIA'S CATHOLIC SCHOOL  
ADVISORY COMMITTEE**



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Submission to NSW Department of Planning, Industry and Environment

### **St Cecilia's Catholic Primary School - Submission to Beaches Link Project Environmental Impact Statement ("EIS"): Objection**

We are the representatives of the Advisory Committee at St Cecilia's Catholic Primary School and are seeking to protect the health, safety and well-being of all St Cecilia's school children. We have more than 270 children (aged between 4 and 12) and over 25 caring and committed staff who work at our school between the hours of 7am and 6pm, Monday to Friday. We also note that the Catholic Schools Office for Broken Bay endorses this objection and will be working with us and St Kieran's to ensure the issues identified are addressed.

Our school community is concerned as to the negative direct and indirect impacts the construction and operation of the Beaches Link Project will impose on the School, its pupils and its staff. Members of our Committee have reviewed the EIS for the proposed Beaches Link tunnel our objections, comments, concerns and requests for clarification are summarised below.

NB: It is important to note that our comments as outlined in the content of our previous submission (dated August 2018) still remains current, and we have included these as an appendix. It is important to note that more importantly, we have never received a response to this submission.

Our comments below are cross-referenced through to the relevant section contained in the appendix with (i.e. our original submission). Rather than repeat these verbatim in the document and to avoid duplication, we have updated our concerns and outline recommendations that we would like to see implemented as conditions of approval for the Project.

Our concerns are intensified due to:

- the extra additional lane added to in the modified link road design;
- the closure of the Sydney Road end of Maretimo Street junction; and
- diagrams of the ventilation stack indicating its location nearer to our school (in contradiction to what is outlined in the EIS).

#### **1. EIS Critical Omission**

Firstly, we would like to highlight that in reference to Part 5, chapter 10 of the Beaches Link Project EIS, information presented on pages 10-961 (Fig 10-4), 10-61 and page 10-66:

St Cecilia's Catholic School is incorrectly characterised with regards to noise impacts. Figure 10-4 identifies our site as a *place of worship* and not a *school*. We occupy a dual site. The site bounded by Wanganella Street, White Street and Seaview Street (i.e. 59 Seaview St, Balgowlah) is occupied by *both* a school and place of education as well as a place of worship: St Cecilia's Catholic Church. - we see this as a critical omission. Please update the assessment noise forecast impact calculations to include our school, as per the *Construction Noise and Vibration Guideline* (Roads and Maritime Services, 2016a).

The daytime background traffic noise levels measured 73dB(A)  $L_{Aeq(15\text{ hour})}$  at monitoring location L35 (corner of Sydney Road and Pickworth Avenue) - and a noise management level and ground-borne noise objective of 45dB(A)  $L_{Aeq(15\text{ minute})}$  (indoors) has been applied. An increase of 16dB(A)

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The use of vibration intensive equipment (particularly impact piling hammers) will also be experienced due to our location being <200m from the construction site boundary. We would like confirmation that St Cecilia's Catholic School is included in the receiver buildings identified for NCA48.1 in Tables 10-24 and 10-26 for vibration intensive work at Balgowlah Golf Course construction support site (BL10) and the Balgowlah connection surface road works.

**2. Detailed Objections, Concerns & Comments**

Issue/ Concern	Recommendation
<p><b>2.1 Construction-air, noise, dust and vibration impacts</b></p>	<p>The School requests that best-practice emissions filtration management be included as a condition of consent, preferably meeting, or exceeding the US EPA <i>National Ambient Air Quality Standards (NAAQS)</i>.</p> <p>More specifically we request the following:</p> <ul style="list-style-type: none"> <li>• A community- based quality monitoring system (CBMS) installed in an appropriate location on our premises for continuous measurement of noise, dust, vibration, and air quality prior to and during construction, and throughout operation (which is - maintained to the same standards as licensed monitoring stations established for the project). A CBMS would provide live data available for the school, which and could be independently audited if required.</li> <li>• The data from air monitoring devices to be regularly provided to the school for distribution to the parent body, in an easily digestible format for lay person during all phases of the Project. This will enable independent assessment against NSW EPA requirements, and global best practice particularly with respect to children's exposure levels.</li> <li>• Provision of a pre-determined plan (to be agreed with the school) specifying what actions that will be taken should air quality, noise, and vibration levels (amongst other conditions) are deemed unsafe.</li> <li>• Severe penalties imposed by the relevant Authority e.g. EPA NSW, Northern Beaches Council) for exceeding air quality, noise, vibration and dust emissions.</li> <li>• A compensation system established for those children directly impacted by air/noise pollution emissions (e.g. asthma attack, anxiety) and/or other safety hazards (e.g. vehicle strike) overtly caused by the Project. This system should also cover claims for augmented grounds cleaning and extra additional maintenance of air- conditioning systems as required.</li> <li>• An independent review of the project's potential air</li> </ul>



Issue/ Concern	Recommendation
	<p>emissions from ventilation outlets is undertaken by the Office of the Chief Scientist and Engineer (publicly available).</p> <ul style="list-style-type: none"> <li>• Noise reduction barriers are fixed by the program around fences on our northern and western boundaries to mitigate noise impacts.</li> <li>• Regular respite periods- during particularly noisy works (e.g. pile driving, jack-hammering) and scheduled into the day. Respite periods should be regularly communicated to our school so that we can tailor recreation for our students to quieter periods.</li> <li>• Regular communication via site/area- specific community engagement groups regarding important periods when noise will need to be limited, e.g. NAPLAN exams, School assemblies (all held outdoors daily) , and special masses and liturgies at sacred times of the year.</li> <li>• All construction traffic must be fitted with non-tonal reversing alarms (e.g. 'quackers') to reduce the impact of constant beeping of tonal reversing alarms.</li> </ul>
<p><b>2.1 Construction Loss of access to green space</b></p>	<ul style="list-style-type: none"> <li>• We remain concerned about the safe use of Balgowlah Oval, which is the only green space that the school has available to conduct sports lessons and recreation activities - particularly considering the inconsistencies in the Beaches Link EIS identified by Northern Beaches Council (refer Section 3 Item 2 of this document).</li> <li>• We still seek assurance that the height of the stack will be sufficient for pollution dispersal, despite being in a valley. For example will exhaust velocity be sufficient during calm conditions (i.e. wind speeds &lt;1m.sec<sup>-1</sup>) coupled with an inversion layer.</li> </ul>
<p><b>2.1 Construction Traffic and road safety impacts</b></p>	<p><b>Worker and contractor parking:</b></p> <ul style="list-style-type: none"> <li>• Implement parking hubs with shuttle buses to construction envelope and enforce 'no parking' on local roads around our school.</li> <li>• Provision of adequate information/warning during site inductions for all contractors and site staff regarding local road use and school zones. We predict that Wanganella Street will be used as a route to cafes and shops at Balgowlah Heights for lunch and coffee breaks. This information needs to be included in the site induction for the entire project duration as new of staff/contractors start work on the project.</li> </ul> <p><b>Traffic congestion:</b></p> <ul style="list-style-type: none"> <li>• Please consider the inclusion of an on-site canteen to reduce the need for staff to leave site and increase traffic on our local streets.</li> </ul>



Issue/ Concern	Recommendation
	<ul style="list-style-type: none"> <li>• Implement a system for staff/contractors to be penalised (e.g. 3 strikes and barred from site) when reported by local stakeholders as not respecting local road, traffic and parking rules.</li> <li>• Time-based restrictions for use of local roads during school zone times (i.e. between 8:00am - 9:30am and 2:30pm - 4:00pm) and restrict truck movements to within school hours and outside school 40km zone.</li> <li>• Include a schedule of staged works as a Condition of Approval to avoid cumulative traffic impacts.</li> <li>• Conduct a detailed study of local traffic impacts with particular focus on roads in the vicinity of our school. Responsibility for this seems unclear, be it with Council or the Project.</li> </ul> <p><b>Trucks carting spoil:</b></p> <ul style="list-style-type: none"> <li>• Preference is for NO trucks awaiting site entry in roads around our school - the construction envelope (BL10) needs to allow sufficient room for trucks to wait and turn around safely. If unavoidable, trucks or vehicles waiting on our local roads must not be allowed to idle.</li> </ul> <p><b>Administration:</b></p> <ul style="list-style-type: none"> <li>• Direct site-specific construction hotline to be established so that a working partnership can be established between the Project and impacted stakeholders so that issues can be actioned quickly.</li> <li>• The above recommendations could be monitored using a numbered sticker system for all Project-related cars, light vehicles and trucks (we understand this has been used on similar projects). This could also assist with reporting child safeguarding concerns if workers are readily identifiable.</li> </ul>
<p><b>2.2 Operation-traffic management and pedestrian safety</b></p>	<ul style="list-style-type: none"> <li>• Installation of a new pedestrian crossing on Seaview Street, as outlined by Council.</li> <li>• All existing pedestrian crossings must become manned with traffic wardens on Wanganella, White and Seaview Streets during construction and operation.</li> <li>• We need to understand the potential for increased congestion on Ethel Street, which is already burdened with the establishment of the new bus hub at Seaforth. Please analyse traffic data specifically between 2:45pm - 3:45pm on weekdays along this road where traffic backs-up to the roundabout beyond the Balgowlah RSL at Maretimo Street.</li> </ul>
<p><b>2.2 Operation- Air pollution and health concerns</b></p>	<ul style="list-style-type: none"> <li>• It is critical that the communication channels and protocols established as part of construction continue into the operation phase, particularly with regards to exceedances in air quality limits.</li> </ul>

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In addition to the concerns previously raised in August 2018, we would also like to raise the following:

Issue	Background	Recommendation
Safe student movement to and from school to Seaforth and North Balgowlah.	An interesting development in the post-COVID world is that we are experiencing increased numbers of our students walking and cycling to and from school, as parents are more likely to be at home working (thus parental supervision available at home). We have a large catchment area across Balgowlah, Balgowlah Heights, Seaforth and North Balgowlah. We therefore have many children who cycle and walk to school through Seaforth Village or via Burnt Bridge Creek shared pathway and up Dudley Street.	<ul style="list-style-type: none"> <li>We urge the Project to consider banning movement of heavy trucks and spoil through Seaforth Village on to Frenchs Forest Road, and up Wakehurst Parkway during construction, and to avoid using these areas for truck waiting zones.</li> <li>Please ensure continued availability of the shared pathway and install monitored CCTV to ensure safe passage.</li> </ul>

### 3. Northern Beaches Council submission

We note that you have received a submission from Northern Beaches Council. St Cecilia's Catholic School endorses the concerns raised in this submission. It is critical that the Beaches Link EIS is read in conjunction with the Northern Beaches Council submission to discern what falls within the scope of the Beaches Link Project of works, and what falls within the scope of Council's operations. For example, it is unclear - with the two documents read side by side - which party is responsible for assessment of traffic impacts and works conducted on local roads. We wish to see a clear outline of roles and responsibilities, particularly during the construction phase.

Reference from Northern Beaches Council submission	Page no.	St Cecilia's Comment
<p><b>Points raised for the Balgowlah Precinct</b></p> <p>1. The intersection of the access road and the sports field carpark shows as signalled on the concept plan. Given the need for the safe crossing point for pedestrian access, the detailed design needs to formally implement all movements signal design at this location.</p>	7	Large groups of our students walk to the oval for sport and lunchtime recreation- we support the need for adequate facilities to support safe pedestrian movement.
<p><b>Points raised for the Balgowlah Precinct</b></p> <p>2. Council's understanding was that the</p>	9	St Cecilia's was of the same understanding as Council- this



Reference from Northern Beaches Council submission	Page no.	St Cecilia's Comment
<p>existing Balgowlah Oval would not be directly impacted for five years, as suggested, and would retain its current function until it required reconstruction to facilitate its expansion. The exhibited plan identifies it as a rectangular field and clearly implies that it will be unusable until 2025 at the earliest. This will pose significant issues for Council to relocate existing users for this period.</p>		<p>incongruence amongst documents must be addressed to answer the question of when Balgowlah Oval will remain useable in its current state for the duration of construction.</p>
<p><b>Stakeholder and Community Engagement</b> 3. Council will seek to establish a Traffic Coordination Group for the project and suggests that given the diverse issues at each project location, it may be necessary to have location specific group meetings. The provision of site-specific community information and complaint resolution staff is seen as a key requirement of a project of this scale. This is to address the specific concerns of the adjoining community along with multiple methods to inform and engage with the community, ideally commencing during the detailed design phase of the project and continuing through the construction program.</p>	12	<p>St Cecilia's supports the proposal that site specific groups should be formed from detailed design given the differing impacts and characteristics of each site to enable better engagement of affected stakeholders.</p>
<p><b>Road issues</b> 4. Council is to be involved in the development and approval of vehicle movement plans for the construction phases of the project, with conditions likely to be placed on the use of local roads during school hours to reduce local impacts, the location of transport vehicle layover and staging areas to minimise noise in adjoining streets away from the State road network. The Project should commence working through the implementation of a Transport Coordination Group in tandem, to the detailed design program, to assess the delivery program to look for delay factors that may not immediately present to those unaware of local issues and behaviours.</p>	13	<p>St Cecilia's supports the need for restriction to be imposed on construction vehicle movements during school zone hours and that vehicle layover and staging areas should not be located close to schools. Our review of the EIS shows that review of local traffic impacts is minimal – specifically focusing on the north side of Wanganella St and not the south where large traffic bottlenecks are envisaged. We support the need to start now to assess delay factors in local traffic.</p>
<p><b>Road issues</b> 5. Consideration will need to be given to the impact of the project on the local schools, especially during the HSC period for Balgowlah Boys High School and Mackellar</p>		<p>We would like to highlight 2 key omissions here being St Cecilia's Catholic School and St Kieran's Catholic School both primary schools with kids aged</p>

Reference from Northern Beaches Council submission	Page no.	St Cecilia's Comment
Girls High School, even though the latter is outside of the immediate works area. Manly West, Balgowlah Heights, Seaforth and Manly Vale Public Schools are also likely to be affected by the project traffic impacts during the Project and they should also be considered during the program scheduling.		between 4 and 12. It is critical to understand the complete total population of school aged children and areas of the council precinct that will be affected by the project. Critically, St Cecilia's is situated 300m from the key works area. This must be added to the document and it is disappointing to be overlooked in this regard.
<p><b>Road issues</b></p> <p>6. Management strategies and improved traffic calming should be introduced during or prior to major construction, preferably as an early works package funded by the project and delivered by Council to reduce the impact of traffic rat-running through the local road network, attempting to bypass construction delays. By bringing this work forward from the operation requirements, it may improve community satisfaction with the Project as a whole, as they see a local benefit early in the program.</p>	13	As highlighted in our submission above - the potential for the worsening traffic congestion and the creation of extra "rat runs" in this school zone area is a key concern. We support this pre-construction work to be undertaken.
<p><b>Road issues</b></p> <p>7. The following concerns have been raised by Council's Transport Team and need to be addressed either through project approval conditions or direct engagement by the project team with Council: Light on detail, considers only major roads and does not consider minor roads on approach to the tunnel portals which are likely to attract additional traffic and suffer increased congestion.</p>	15	Our review of the EIS shows that review of local traffic impacts is light – specifically focusing on the north of Wanganella St and not the south of the street where large traffic bottlenecks are envisaged. We support the need to start now to assess the need for traffic calming measures with regards local traffic.
<p><b>Road issues</b></p> <p>8. Potential to remove some rat-running traffic from Balgowlah Heights/Clontarf via Heaton Avenue &amp; Kanangra Crescent and Ethel Street but potentially to redirect it to Wanganella Street &amp; Seaview Street. The community is already concerned about existing speed and volume of traffic in Wanganella Street and Seaview Street past St. Cecilia's School. Traffic calming measures in Wanganella Street &amp; Seaview Street are requested. The ongoing anticipated poor performance of the Frenchs Forest Road and</p>	17	We have highlighted for many years through representations at local and state level, our local member, and the minister for transport with regards to the speed and volume of traffic along Wanganella & Seaview Streets. We support the need for traffic calming measures.



<b>Reference from Northern Beaches Council submission</b>	<b>Page no.</b>	<b>St Cecilia's Comment</b>
Sydney Road roundabout may mean the rat-run via Kanangra Crescent is not in fact eased.		
<b><u>Air quality</u></b> 9. Council requests that the proponent undertakes further data collection on ambient vehicle emissions around the local catchments prior to, during and after construction to allow for a robust assessment of the approved ventilation systems and allow the operator to provide additional filtration measures if the need arises.	21	St Cecilia's strongly supports this recommendation.



**Donation Declaration**

I declare that neither the Advisory nor the School have made any reportable political donations in the previous two years.

Yours sincerely,

**Chris Bignold**

St Cecilia's Advisory Committee Chairman

**Sonia Walsh**

St Cecilia's Advisory Committee

**Fran Taylor**

Principal St Cecilia's Balgowlah Catholic school