

Councillor Zoë Baker, Wollstonecraft Ward, North Sydney Council  
Councillor MaryAnn Beregi, Victoria Ward, North Sydney Council  
Councillor Tony Carr, Tunks Ward, North Sydney Council

The Hon Robert Stokes  
Minister for Planning Industry and Environment  
4 Parramatta Square, 12 Darcy Street,  
PARRAMATTA NSW 2150

**Attention: Ms Belinda Scott**

26 February 2021

## **Objection to State Significant Infrastructure Application No. SSI-8862**

### **Beaches Link and Gore Hill Freeway Connection**

We refer to the above State Significant Infrastructure Application. We adopt the submissions set out in the Council officer's report to the North Sydney Council meeting held on 22 February 2020 entitled Item 8.6. Beaches Link and Gore Hill Freeway Connection EIS Submission.

In addition, we submit the following summary of our objections to the application and urge you to refuse the application for the following reasons.

#### **Failure to meet the requirements set out in the Secretary's Environmental Assessment Requirements (SEARs)**

The State Government has an obligation to be a "model applicant" in submitting any State Significant Infrastructure application. This application does not meet the standard expected of a model applicant.

There are internal inconsistencies within the submitted documents and a failure to meet the requirements of the SEARS. For example, the EIS fails to demonstrate any adequate analysis of "how alternatives to and options within the project were analysed to inform the selection of the preferred alternative / option", including public transport options. Furthermore, the EIS is littered with numerous mistakes and inaccuracies in the various technical reports.

#### **Notification of the application is flawed and inadequate**

The notification of the application was flawed and inadequate. To conduct "community engagement" on an infrastructure project of this size and scope under the cover of COVID-19 demonstrates utter contempt for both the process and the residents, students, businesses and workers affected by the proposal.

The notification period provides too little time for the community to digest and respond to voluminous and technical documents (more than 9,000 pages of EIS). This is the first opportunity that the community has had to understand the specific route, location of stacks and detail of this project.

It is clear that many people significantly impacted by this project are unaware that the consultation was underway and concludes on 1 March 2021.

We, therefore, urge you to significantly extend the notification and community consultation of this application until the State of Emergency and COVID-19 pandemic has been lifted so that you may complete a rigorous and inclusive community consultation.

### **No travel time benefits – questionable evidence provided**

The stated “benefits” are unsupported and have no basis in fact.

For example, the EIS claims that there will be a time saving of 56 minutes from Dee Why to Sydney Kingsford Smith Airport. However, Google Maps currently cites the trip as between 47 minutes and 1 hour 15 minutes. To suggest that it would be possible to travel from Dee Why to the Airport (30km) in 19 minutes is absurd.

There are many other such examples throughout the EIS.

### **Devastating environmental and social impacts of the application on the whole of the North Sydney Local Government Area**

#### **Loss of public open (green) space**

There is an existing lack of adequate public open space in the North Sydney local government area. The proposal will have a devastating impact on existing public open space (particularly green space) in North Sydney. There will be a permanent loss of 28,896m<sup>2</sup> of land in Cammeray Park and the removal of Council’s stormwater harvesting facility.

There is absolutely no need for the proposed WHT/Beaches Link/Gore Hill Freeway Connection Motorway Facilities Buildings to be located on the surface. The proposed location of these facilities will have significant adverse visual impacts and will result in the permanent loss of precious, highly valued public green space.

The proposal will have devastating impacts on public open space, particularly vital urban bushland, in Flat Rock Creek, Middle Harbour, Seaforth and Balgowlah.

The significant permanent loss of public open (green) space in the North Sydney local government area and throughout the tunnel corridor warrants refusal of this application.

#### **Air quality**

Existing air quality in the North Sydney Local Government Area is poor – the community health impacts due to the proximity of a highly dense and sensitive population to the existing Warringah Expressway will be adversely and significantly exacerbated if the project proceeds.

The location of unfiltered ventilation stacks close to pre-schools, primary and secondary schools and hospitals cannot be supported and are grounds for refusal.

#### **Traffic impacts**

The project fails to provide a sustainable response to metropolitan congestion. The provision of such a tunnel is counter to all reasonable and sustainable transport and traffic planning evidence and principles. The project will result in significant adverse impacts including, but not limited to, significant net additional traffic on Berry Street, Miller Street, Falcon Street and Pacific Highway (south of Falcon Street) as well as significant reductions in levels of service.

The occupation of construction site BL1 (the Cammeray Golf Course construction site) will be extended by 2 years to 7 years in total as a direct result of the BL&GHF projects.

This will cause significant flow-on impacts on other arterial and local roads in the North Sydney local government area.

The proposal as shown in the EIS (i.e. four traffic lanes - Berry Street) will directly and indirectly impact upon numerous adopted and draft State and Local Government strategic projects and initiatives. The proposal will cut a swathe through the North Sydney CBD public domain initiatives without delivering any real benefits to ameliorate or ease traffic congestion within the region.

### **Environmental impacts**

The proposed submerged tunnel construction method across Middle Harbour requires significant dredging and sediment disturbance of the harbour floor

The environmental impacts associated with dredging and cofferdam construction in the harbour are significant, unnecessary and will result in adverse and permanent impacts on water quality, marine biodiversity, foraging habitat as well as known roosting sites of threatened species.

As the project facilitates private vehicle travel and will result in induced demand, there will be consequential environmental impacts from increased traffic movements along the tunnel corridor.

In short, the proposal will have devastating adverse impacts on the environment including, but not limited to:

- disturbance to the Sydney Harbour floor and consequential impacts on maritime ecology and heritage;
- water quality in Middle Harbour and throughout the entire catchment along the tunnel corridor, marine biodiversity, foraging habitat as well as known roosting sites of threatened species;
- loss of Council's stormwater harvesting and filtration facility in Cammeray Park; · on-going impacts of "induced demand" as motorists take advantage of increased capacity and the congestion problems, over time, continue to be replicated on an increasing scale leading to an increase in greenhouse gas emissions and particulate matter.

### **Heritage**

The proposal should be refused as a result of the unacceptable and significant impacts upon, numerous Heritage items of State and Local Significance including items of maritime and convict heritage. Further, the proposal will have a devastating impact on a number of items of Aboriginal heritage and numerous other remnant evidence of first inhabitants.

The EIS acknowledges these impacts on Aboriginal heritage and heritage items and proposes inadequate management strategies that cannot be relied upon to protect and preserve heritage along the tunnel corridor.

### **Visual bulk and scale**

The proposal will result in unacceptable adverse impacts on visual amenity including the provision of large, ugly acoustic screens along the route and the impacts of the buildings to house the on-going operations of the tunnels.

## **Public Domain impacts**

The proposal will have significant adverse impacts on the public domain in the North Sydney CBD and the local government area generally.

## **Conclusion**

This application will not deliver any amelioration to traffic congestion and will have devastating environmental, health and social impacts. In summary, we urge you to refuse the application for the following reasons:

- a) the lack of a business case for the project;
- b) lack of meaningful community consultation
- c) the lack of alternative transport options including public transport
- d) the lack of filtering in the proposed exhaust stacks
- e) significant and devastating loss of public open space and future open space, loss of sporting facilities, loss of trees and canopy, loss of stormwater harvesting and water treatment infrastructure
- f) significant adverse impacts on public health and wellbeing, particularly on schools, school children and residents
- g) devastating environmental impacts on waterways, reserves, flora and fauna
- h) inappropriate and untested mitigation measures
- i) significant adverse impacts on aboriginal heritage and maritime environment

For all of the reasons set out above this application should be refused.

Yours faithfully

Councillor Zoë Baker, Councillor MaryAnn Beregi and Councillor Tony Carr  
North Sydney Council