

To: Director - Transport Assessment, Planning and Assessment, Department of Planning, Industry & Environment	
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## **RE; SUBMISSION ON BEACHES LINK EIS (SSI-8862)**

I am writing to express serious concerns on the inadequacy of the EIS in relation to the issues and impacts associated with the Flat Rock Gully support site.

The EIS is not adequate and does not meet contemporary planning and environmental impact assessment standards and practices required for consultation and project approval in relation to the following issues at the Flat Rock Gully support site.

- Site contamination and remediation (not properly assessed in EIS);
- Construction noise and vibration (not properly assessed in EIS); and
- Construction traffic noise at Flat Rock Gully Drive (not properly assessed in EIS).

These issues and impacts have profound effects on local residents' home and family life, health, property and livelihood, and must be given the heaviest weight and addressed fully in detail in the EIS community consultation phase and before any project approval.

The proposed development of essentially a deep quarry hole and underground tunnels in the middle of a residential and parkland area warrants nothing less than full and detailed assessment in the EIS in accordance with contemporary best practice.

It is particularly distressing that these matters have been given scant regard with seemingly no more than desktop assessments, and are not being fully addressed in consultation with the community in the EIS after being raised by the local community in pre-consultations with TfNSW in 2019-20. The EIS neglects to fully and substantially address these issues around the Flat Rock Gully site raised previously by the local community.

The EIS and any project approval emanating from it would be invalid without the matters below being fully addressed in detail. The EIS needs to be readvertised with the matters below fully addressed in it.

### **1. Site contamination and remediation (not properly assessed in EIS)**

The EIS identifies the support site at Flat Rock Gully as being previously used as a waste disposal site and being contaminated, most likely heavily contaminated. The EIS states a contamination study will be carried out. This means the contamination study will be prepared following the required community consultation on the EIS, and is not required to be the subject of community consultation and can be hidden from the local community. This is entirely inadequate and unconscionable in the circumstances. The proposed works in such a contaminated site has potential to release toxins into the environment and affect the health of people and the local environment and waterways, and the EIS is entirely inadequate in addressing such a significant issue and impact.

Contemporary planning and environmental impact assessment practices require a Phase 2 Contamination Investigation and Remediation Action Plan approved by an accredited auditor to be submitted with environmental impact assessments for developments on land on which there is known contaminated material. This is particularly the case where there is likely heavy contamination such as a previous waste disposal site at Flat Rock Gully. Without a Phase 2 investigation, the exact make-up of contamination on the site is not known and the issue cannot be properly assessed and dealt with.

The EIS needs to be readvertised with a Phase 2 Contamination Investigation and Remediation Action Plan approved by an accredited auditor consistent with contemporary practice in planning and environmental impact assessment. The EIS and any project approval emanating from it would be invalid without it.

## **2. Vibration and Noise (not properly assessed in EIS)**

The EIS states that our strata property at 5-11 Garland Road will be subject to noise at levels of 55-75+dBA and vibrations at a level that is disturbing to residents and will damage our building from activities at the Flat Rock Gully site.

The EIS then goes on to state that a noise and vibration management plan will be prepared at some point in time to address noise and vibration impacts.

The projected noise and vibration impacts on the property at 5-11 Garland Road are devastating to peoples' lives, health and property. The response in the EIS to prepare a noise and vibration management plan at some time in the future which may or may not be in consultation with affected residents is entirely inadequate. The degree to which this huge impact on peoples' lives and property is addressed in the EIS is negligent.

The EIS needs to be revised and readvertised with the proposed management plan measures to address these massive noise and vibration impacts on residents lives, health and property.

## **3. Construction traffic noise at Flat Rock Gully Drive (not properly assessed in EIS)**

The following facts around the existing traffic noise environment and impacts of proposed construction traffic noise at the Flat Rock Gully support site are not addressed in the traffic noise assessment and EIS. The EIS is inadequate in this regard and needs to be readvertised with the facts below taken into account in the traffic noise assessment.

### ***3.1 Existing traffic noise environment (not considered in EIS)***

The following facts around the existing noise environment at the Flat Rock Gully support site which have substantial implications for the traffic noise assessment are not addressed in the EIS:

- **Negligible existing truck movements:** Flat Rock Drive is not a truck route, and it has a negligible amount of truck movement. The commentary in the EIS on Flat Rock Drive being a main road and implying it is an existing truck route is not an accurate base case for the noise assessment and EIS.
- **Residential commuter street:** The comments in the EIS about construction traffic associated with the Flat Rock Gully site being on a main road away from local residential streets is an inaccurate representation. Flat Rock Drive and Brook Street have residential properties along their entire length other than in the gully itself. These streets are historically residential streets upgraded over time to cater for light vehicle commuter traffic to and from the city. It is not a main road heavy vehicle truck route.
- **Free flowing traffic with minimal noise in Flat Rock Gully:** The traffic in Flat Rock Drive is free flowing with no traffic stopping in the gully. This means the existing traffic noise in this relatively steep gully does not involve any loud vehicle heavy braking or acceleration and is a steady low 'woosh' noise which is not disturbing to residents. This is an important factor in the existing base noise environment which is not taken into account in the noise assessment in the EIS.

### ***3.2 Noise impact of construction traffic (not considered in EIS)***

- **Massive increase in volume of truck movements:** The heavy vehicle traffic generation from activities proposed for the Flat Rock Gully support site would massively change the nature and type of vehicle traffic using Flat Rock Drive and Brook Street from the overwhelmingly light vehicle commuter traffic currently using these roads to large volumes of heavy vehicles / trucks. Flat Rock Drive and Brook Street are not currently a main truck route and have a negligible amount of truck movement. This factor is not properly accounted for in the traffic noise impact assessment in the EIS.

- **Numerous residences affected:** The heavy vehicle traffic generation from activities proposed for the Flat Rock Gully support site would impact on residences and peoples' homes and lives along Flat Rock Drive and Brook Street. The comments in the EIS about construction traffic associated with the Flat Rock Gully site being on a main road away from local residential streets is an inaccurate representation. Flat Rock Drive and Brook Street have residential properties along their entire length other than in the gully.
- **Massive increase in vehicle / traffic noise in Flat Rock Gully:** The activities proposed for Flat Rock Gully include the introduction of a signalised intersection at the bottom of the steep gully at Flat Rock Drive which would introduce loud traffic vehicle braking and acceleration and substantially increase traffic noise in this area. The proposed intersection would substantially increase traffic noise in the area from the steady low 'woosh' noise of free flowing traffic through the gully on Flat Rock Drive which is not disturbing to residents, to loud traffic noise associated with vehicle heavy braking in descending the steep gully to stop at the proposed intersection, and loud noise associated with heavy acceleration ascending out of the steep gully from a standing start at the bottom proposed intersection. This substantial increase in noise is massively accentuated by the fact that this heavy braking and acceleration in the gully on Flat Rock Drive will be from loud heavy vehicles / trucks hauling heavy loads associated with the proposed works at Flat Rock Gully. It will also be accentuated by the gully topography in which noise will emanate and echo out and up the gully. These are important factors that influence traffic noise and are not addressed in the noise assessment and EIS.

The EIS is inadequate in addressing the construction traffic noise associated with the proposed activities at Flat Rock Gully for the reasons outlined above. It is in essence no more than a desktop assessment that fails to properly take into consideration and account for the particular environmental circumstances at the site described above.

## Conclusion

The issues and impacts above associated with the Flat Rock Gully support site have profound effects on residents' family and home life, health, property and livelihood. These matters must be given the heaviest weight and addressed fully in detail in the EIS community consultation phase and before any project approval.

The EIS is not adequate and does not meet contemporary planning and environmental impact assessment practices required for consultation and project approval in relation to the following issues at the Flat Rock Gully support site.

- Site contamination and remediation (not properly assessed in EIS);
- Construction noise and vibration (not properly assessed in EIS); and
- Construction traffic noise at Flat Rock Gully Drive (not properly assessed in EIS).

The matters raised above need to be addressed fully in detail and the EIS revised and re-exhibited for public comment before the project can be approved. The EIS is not adequate in regards to these matters for the project to be approved. Thank you.

Yours sincerely

