

Attention: Director, Transport Assessments  
Planning & Assessment, Department of Planning  
Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Note: Please delete my personal details before publication

27<sup>th</sup> February 2021

**Objection: Beaches Link and Gore Hill Freeway Upgrade – SSI\_8862**

I write to express my objection to the Beaches Link and Gore Hill Freeway Project. I have done my best to read the extensive EIS documents at this very difficult time. I have significant concerns about the justification for this project particularly given that there is no published business case, it is not high on Infrastructure Australia's priority list, the EIS demonstrates a significant risk to health and safety and the project and an alternative public transport option has not been fully scoped and compared.

I object to the project for the following reasons:

1. The timing of release of this project at the end of what has been a very challenging year. This project impacts a large number of schools and passes through highly residential areas. Families, community groups and schools have been under a huge amount of strain throughout the exhibition stage. School P&C's did not have the opportunity to review the documents and parents were caring for children on school holidays. The 12,000+ paged documents are very difficult to read on screen and the Library was not allowing borrowing. The project should be re-exhibited well after the COVID-19 crisis has passed and when normal life returns and when we understand the permanent changes that it has made.
2. I object to the project due to the contamination risks it presents to the environment and to human health and the negative impact on our precious waterways and green spaces. According to the EIS, 500m<sup>3</sup> of stockpiled spoil is permitted outside the shed; 4500m<sup>3</sup> is permitted outside the Cammeray Golf Course Site. Given that contaminants have been identified and the EIS states that dust is "difficult to contain" even with the best mitigation measures in place this is a considerable risk particularly to children's sport that is played adjacent to the Flat Rock and Cammeray Sites. Furthermore, silt dispersion modelling in relation to contaminated sediment has been done for a period of '1.2' weeks (see Fact Sheet) but this is less than the time required to remove contaminated sediment. The dredging program is forecast to be 37 weeks. The modelling should cover the time it will take to remove the contaminated sediment. This is another reason to do a revised EIS and put it on exhibition.

In order for this to go ahead I would like to see a reissue of the EIS following Phase 2 assessment:

- All further testing mentioned in the EIS should be done now and the results plus the results of all testing already complete, released. The revised EIS should be exhibited so that people can comment on the adequacy of proposed management strategies and the likely impact to the community based on use of the area.
- A full risk assessment prior to approval and sign off. Health risks associated with run off, spills and risk to Northbridge should be included ie worst case scenario not best case health assessment as currently assessed
- Abandonment of the immersed tube construction method at Middle Harbour and its replacement with a tunnel through bedrock which would not disturb the contaminated sediment
- Real time/ Alert Style Air Quality Monitors at Bicentennial Reserve to alert the community to air quality risks born from dust, disturbance or diesel
- Real time/ Alert Style Monitoring at Northbridge Baths

- Silt curtains which go to the seafloor and are not permeable rather than part of the way
- Restriction of project related shipping movements to an agreed schedule of times when the tides ensure that the sand bar at the entrance to Middle Harbour will not be disturbed by such movements
- Wastewater to be treated via a method other, or in addition to, sedimentation only to ensure that the full range of dangerous chemicals identified are properly removed.

3. I object to the project due to the unreasonable level of impact on the Quality of Life of residents during the tunnel construction and operation because of the large number of additional construction vehicle movements will be required across the project servicing multiple construction sites. These sites are in and around schools, sporting fields and school transport corridors which increases the safety risk. This burden will be placed on residents, school children and motorists in Northbridge, Willoughby, Artarmon, Crows Nest, Cammeray, and Naremburn for upwards of 8 years.

In order for me to understand the reported benefits of the project and to make a better assessment of the impact on Quality of Life I would like to see:

- The release of the business case for the Beaches Link and Gore Hill Freeway connection that has never been made public. This will tell us whether the Beaches Link is the most efficient, cost effective infrastructure to reduce congestion to and from the Northern Beaches
- A full reassessment of the traffic flows to and from the Northern Beaches needs to include data collected after 2016, data also needs to be collected on the number of Northern Beaches residents who work in the area and how many work from home.
- A re-assessment of surface level traffic with all major local roads included in the operational modelling ie) Eastern Valley Way, the full span of Military Rd and Willoughby Rd was not included.
- The surface road traffic assessment should then inform the pollution impact of the project as the pollution contribution is not only limited to the stacks.

4. I object to the project due to the threat to our biodiversity and green spaces. Bushland set aside for environmental protection should not be destroyed or disturbed. Flat Rock Reserve is a declared Wildlife Protection Area as it provides significant habitats that support a wide range of small birds, mammals, reptiles and frogs that are disappearing from our urban areas Flat Rock Gully is a key part of the network of wildlife corridors across Sydney required to maintain biodiversity. Around 6.77 hectares (over 16 acres) of bushland will be flattened for the construction footprint (EIS Chapt. 19, p.19.9) at Flat Rock Gully. Around 54 acres of bushland, which provides important habitat for wildlife in the Willoughby and Manly local government areas, will be destroyed at the combined sites.

Over 390 trees are targeted for potential destruction at Flat Rock Gully – only two-thirds will be replaced. Willoughby City Council (WCC) tree policy requires that 3 trees be replaced for each removal (WCC, Vegetation Management Strategy 2020). Local tree policies are required by the NSW Government to reflect the needs of different areas for tree canopy and wildlife habitat. These should not be overridden by the NSW State Government.

The bushland at Flat Rock Gully has been targeted for destruction on the basis that it is 'only' regenerated bush. This regeneration is the result of 25 years of work by WCC and bush care volunteers. Most of the plantings were propagated from local indigenous plants. Wildlife has returned to this site and this is to be celebrated not destroyed.

Biodiversity is poorly scoped in the EIS. The bulk of the biodiversity assessment concentrates and comments on 23 threatened species only. It side-steps the many hundreds of species which will lose their habitat, be driven away or bulldozed under including a wide range of bird species, frogs, reptiles, mammals and aquatic animals.

I also object on the grounds that:

- A full study of wildlife has not been, and will not be, carried out in Flat Rock Gully, Middle Harbour and nearby bushland. Desktop assessments and a few walk-throughs are inadequate to reveal its full

biodiversity.

- The use of the controversial biodiversity offsetting policy allows for the clearing of bushland in urban communities. This policy, which allows for destruction of biodiversity in one area as long as it is protected somewhere else in NSW, is a recipe for local extinction.
  - The EIS acknowledges that animals and birds on the construction footprint and nearby bush reserves will be driven away, **in some cases permanently**, by loss of habitat, food and breeding sites and by the noise, lights, vibration and traffic yet there are few well-developed mitigation plans for the variety of species which will be impacted. (EIS p.19-64).
  - The proposed mitigation measures to protect wildlife during construction are weak. Checking that no animals are in the way 24 hours before construction or having people 'spot' them from barges and remove them during construction seems doomed to failure as it will not be the main focus or within the expertise of most constructors and how on earth would this be monitored?
  - The health of local creeks, waterways and the marine environments are at risk from scouring, elevated salinity, siltation, contamination by disturbed toxic materials from the tip site and accidental fuel or chemical spills. Groundwater drawdown of more than 20 metres will contribute to trees becoming stressed or dying in other parts of Flat Rock Gully away from the construction footprint, especially in times of drought.
  - Excavation of Middle Harbour sediment has the potential to release heavy metals, pesticides and tributyltin, a chemical used in cleaning boats, which has been banned since 2008 as it causes sex changes in marine organisms.
  - The EIS is inconclusive on the future of the destroyed site which is 5% of the Flat Rock Gully Reserve. Decision-making about its future should not be left to the end of the construction process. The EIS should confirm its rehabilitation and return it to bushland.
5. I object to the project as it is a tolled road and there is little evidence that it will alleviate current congestion. The only local entry points for the Beaches Link are via Artarmon and Berry St North Sydney – no local time saved. The EIS makes it clear that this is not a local congestion solution – several local intersections fail or will experience a worse level of service both during and after construction as a result of the project. Furthermore the tunnel does not achieve goals – only 10% reduction in short term on Military Rd based on FUTURE predicted traffic growth not today's levels. The growth model is not made available in the EIS so the travel time savings and congestion reductions are unable to be verified. Where a road is already at capacity it is self limiting ie) future growth cannot overreach the ceiling capacity of the road and therefore a travel time saving or reduction cannot be claimed on this basis. Traffic differential modelling in the EIS shows increased traffic flows around the Warringah Freeway and on the Beaches exit roads. The project appears to transfer pinch points to alternate locations rather than solving congestion. This is seen time and time again following the construction of similar projects eg Eastern distributor & congestion on General Holmes Drive and Harbour Tunnel at northern end or Westconnex extension and the resultant congestion on the City West Link at Haberfield leading up to the tunnel.
6. I object to the project as it has a poor climate profile at a time when we should be looking to projects which reduce our emissions. The EIS confirms very high water usage, waste generation and concrete production. This project does not help us achieve our climate goals, instead it contributes negatively. Climate change is well documented as the largest and most important risk that the world faces at this current time. Every decision made by governments on behalf of it's citizens should be supporting sustainable solutions as the utmost of priority. This project does not meet that criteria.
7. I object to the project as there has been no publicly published business case and the costs demonstrated in the EIS seem to far outweigh the benefits. The EIS also fails to fully scope many aspects such as utilities and contamination which poses a risk to the project.

8. I object to the project because the B-Line buses have been successful in reducing congestion and no public transport alternative study has been done with which to compare this project.

This project is a missed opportunity to transform Sydney into a world class, healthy and sustainable city with a strong public transport system. The EIS demonstrates that this toll road will be extremely expensive to build and is a high risk project with minimal benefit. I would ask that an alternative public transport feasibility study be published before any further planning occurs so that impacts and outcomes can be fairly compared.

Yours sincerely,

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[REDACTED]  
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Declaration of any reportable political donations made in the previous 2 years.	I have not made any reportable political donations in the past two years.
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