



F6 Extension Stage 1  
Application number  
SSI 17\_8931  
Preferred Infrastructure  
Report  
SUBMISSION





## **Attention Director-Transport Assessment**

This document contains the formal response to the Preferred Infrastructure Report (PIR) by the F6 Action.

F6 Action is a community group made up of residents from across the F6 stage 1 route between Arncliffe and Kogarah. We are not affiliated with any political party nor have we made any donations to any political party.

This submission is an **OBJECTION** to the F6 Extension Stage 1 (the Project) i.e. the subject of the Preferred Infrastructure Report, and including the entire WestConnex proposal (WestConnex) of which the Project is a part. Any statements in this submission which refer to amelioration of predicted impacts should not be interpreted as endorsement or support for any aspect of the Project. It is F6 Action's position that the impacts of the Project are unacceptable and cannot be managed in such a manner that is acceptable. For the reasons set out in this response, we do not believe that the EIS meets the Secretary's Environmental Assessment Requirements (SEARS) and therefore no part of the EIS or this PIR should be approved.

For enquiries relating to this submission, please contact us at:

**F6 Action**  
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## 1. Executive Summary

The PIR aims to describe design refinements proposed to address issues raised by the community during the EIS phase, being modifications to local road egress and an extension to the cycleway.

F6 Action does not object in principle, to improving egress for highly impacted residents in the immediate vicinity or to improvements to active transport modes of walking and cycling. Unfortunately, the proposals contained in the PIR are not fit for purpose. We further consider that the proposals, under the guise of “we are listening to the community” are an insult given that community concerns, including our most serious concerns, have been ignored.

## 2. New key issues raised against the proposals contained in the PIR:

1. This is the third time F6 submissions have interrupted a holiday break, this time Easter, where residents should be spending time with friends and family.
2. The local road amendments involve three additional sets of traffic lights, which will result in more traffic delays with additional vehicle pollution.
3. The PIR contains misleading statements that a single ‘Local Traffic Workshop’ held on 28 November was referred to as a ‘Transport Working Group’ in the report.
4. The cycleway extension will significantly impact the heritage-listed Patmore Swamp, a valuable wetland.
5. The PIR contains false statements that Bayside Council endorses the location of the cycle route extension through the wetlands.



### 3. Key issues raised by the community against the F6:

The Community has raised serious concerns regarding the F6 toll road because it is not in the public interest. These concerns about the Project are:

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1. It is inconsistent with the community preference for public transport enhancements.
2. It worsens local traffic congestion
3. It increases dangerous diesel pollution from tunnel portals, unfiltered exhaust stacks and the inevitable induced traffic
4. It removes critical green space and heavily impacts sensitive wetlands
5. It reduces urban liveability due to increase in traffic noise and the physical barriers roads cause through the local environment
6. It leaves families with staggering home repair bills due to ground subsidence that the proponent refuses to acknowledge
7. It exposes residents to long term construction and the associated construction fatigue
8. It fails to demonstrate how it will create a “vibrant commercial area in a pedestrian friendly environment” when extended clearways are also proposed on key local routes
9. It fails to identify or address the significant negative impacts of roads on people and the loss of community health in two ways – by encouraging walking and reducing car dependence
10. It fails to demonstrate that the stated objectives can be achieved, despite being contrived after the decision to build more roads was made.
11. It makes no sense from a transport planning perspective. One third of Sydney is already devoted to roads and parking, yet chronically underinvested in public transport.
12. It represents a lost opportunity to really revitalise car dependent communities by investing in transport alternatives
13. It imposes expensive tolls on families and small business operators
14. It is in the interest of the private operator Transurban to pump more toll revenue to the WestConnex M5 and can in no way be construed to be in the public interest.



## 4. Proponent and sub-contractor behaviour

The community has also raised key concerns regarding the poor behaviour of the proponent and sub-contractors exhibited with other WestConnex phases which have never been appropriately addressed, which will also affect F6 Extension Stage 1 as these issues are most definitely going to re-occur with the Project:

1. Failure to repair homes damaged by construction and tunnelling, as reported by families from Homebush, Haberfield, Concord, North Strathfield, St Peters to Beverly Hills.
2. Indifference and failure to properly manage the long-term intrusion into people's lives due to insufficiently regulating, monitoring, mitigating nor enforcement of conditions of approval, as weak as they are.
3. Indifference and failure to properly manage complaints. The experience residents elsewhere have, when they have legitimate complaints about dust, noise or other, is one of slow response and often no response.
4. Consistent breach of promise on repairing the urban environment on completion.
5. Failure to not benchmark the cost of the toll road against the cost of rail solutions represents a serious and significant shortcoming of the F6 Extension EIS and Business Case
6. Community consultation sessions that are a sham
7. Failure to disclose details of the contract with Transurban including "no compete" like and "minimum revenue" like clauses
8. Failure to disclose the details of all stages of the F6 to the public. If it's a great proposal to benefit the public, why is it shrouded in secrecy? Rail proposals (usually that never see the light of day) are regularly announced as that is what the public want and need.
9. Failure of the Department of Planning and Environment in enforcing compliance with conditions of approval, despite already weak. This results in virtually no protection to the community.





## 5. Patmore Swamp impacts



The proposals demonstrate reckless indifference to the historical and ecological importance of Patmore Swamp.

The wetlands form part of a system of tidal and freshwater swamps, and provide important habitats for a variety of animal and plant species, including common wetland birds and a number of protected migratory birds. The Patmore Swamp and Scarborough Ponds are part of the central wetland system which drains into Botany Bay.

Mobile species may be able to move away quickly and easily during construction. The swamp population includes less mobile species that are slower to move away or may not



relocate at all, potentially resulting in injury or mortality of the individual animal. This includes kookaburras, magpies and turtles.

Further, there are now less and less places for these animals to go because of the consistent loss of habitat.

If the Southern extension is approved, we lose two endangered ecological communities and the risk our key fish habitats in the Scarborough Ponds. This loss of vegetation is additional to what we will lose in Rockdale.

Bayside Council in their F6 submission specifically requested to remove the pathway out of the wetlands. It is therefore a false claim in the PIR that Bayside Council support the extension proposal.

F6 Action disagrees with the RMS claims that proposals of the boardwalk minimises impacts where the construction involves:

- Further vegetation clearing
- Excavation of spoil
- Dewatering & piling of foundations
- Construction of temporary access road
- Permanent lighting causing spillover to animal habitat
- Disturbed sediment and erosion impacts
- Sediments that potentially contain toxicants and elevated nutrients

F6 Action is sceptical of the assurances that *“the design of the project, including post construction landscaping works, would rehabilitate the portion of Patmore Swamp area that would be impacted during construction works. The project has the potential to have a positive heritage outcome through promoting the aesthetic significance of the swamp”*.

## 6. Consistent breach of conditions

Communities elsewhere are finding that the loss of green space and trees is far greater than originally proposed in the EIS (Sydney Park St Peters and Haberfield parks). It's reasonable for St George and Bayside LGA to expect a similar outcome.

It is also reasonable for us to expect that the promised rehabilitation works are watered down or not delivered at all, as already witnessed at St Peters, Concord and Beverly Hills.



F6 Action is also concerned that the number of complaints regarding property damage (refer Westconnex) is rising due to ground subsidence. Residents across the route are reporting similar cases of unconscionable treatment by RMS and WestConnex who deploy the strategy of stonewalling and denial. The unprofessional and brutal conduct of the proponent is not befitting of a Government sponsored infrastructure project. It beggars belief that such behaviour has been permitted to continue and that the Department of Planning and Industry have not stepped in to enforce compliance. This is going to happen again with the F6 Extension, yet no care or consideration around ground subsidence is evident in the PIR.

Nowhere is there any serious attempt to assess what the impacts of this project, as well as the cumulative impact of other nearby projects, would actually be on our urban area. There is no recognition in the F6 Extension EIS or PIR that WestConnex might have learnt from distressing experiences reported by people who were already living through Stage 1 and Stage 2.

F6 Action rejects the assertions and justifications for the F6 Extension is based on a business model that relies upon increased car use; it entrenches car dependence. The NSW Government should be planning to reduce car dependency to avoid further deterioration in our air quality. No amount of so called parks, cycleways or pedestrian walkways will mitigate the polluting impact of this Project.

Ian Bell, actuary and transport analyst <sup>1</sup>“The greatest flaw in this project has perhaps been the failure to consider, from the start, whether rail might have been a better option than road. There was no “Public Sector Comparator” to contemplate a mass transit alternative which might be cheaper and more efficient. No public consultation or discussion. Just roads to be privatised, tolls to be had to juice up the sale price from privatisation”.

The Parliamentary Inquiry into the Impacts of WestConnex of October 2018 revealed a huge amount of evidence submitted on the damage that WestConnex has done to the social and physical fabric of Sydney over the last five years while these events have been played out. The costs of this planning fiasco will be borne by the travelling public, individual families and home owners/occupiers, and the broader community, to the profit of a small set of private corporations and their senior management. These events raise serious questions about the

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<sup>1</sup> <https://www.michaelwest.com.au/westconnex-sale-looms-as-bidding-duel-narrows-to-transurban-industry-funds/>





independence of NSW Planning, which seems to have been reduced to a rubber-stamping exercise in the face of chaotic and inadequate transport planning.

It is F6 Action's position that the impacts of the Project are unacceptable and cannot be managed in such a manner that is acceptable. For the reasons summarised above and in our detailed response to the EIS, we do not believe that the EIS meets the Secretary's Environmental Assessment Requirements (SEARS) and therefore no part of the EIS or this PIR should be approved.

Global cities focus on getting cars off the roads by investing in well integrated public transport. The F6 Action continues to object to the F6 being a project that should have remained in the archives of 1948.

The proposal of the F6 Extension demonstrates reckless indifference to the health, liveability and mobility for southern communities.



## 7. Sample objection from local child

We received many submissions from local children, one of which is shown here for your reference.

Department of Planning and Environment  
Application number SSI 17\_8931  
GPO Box 39 Sydney NSW 2001

I object to the F6 Extension because  
**it is too close to the School**

The diagram is a hand-drawn sketch on a piece of paper. On the left, a vertical road is drawn with dashed lines and labeled 'road'. To the right of the road is a large, irregular shape representing a 'Field'. Inside the field, there are four stick figures, each with a speech bubble containing the word 'Cough'. To the right of the field, there are three squares representing 'Classrooms', with an arrow pointing from the label 'Classrooms' to them. The entire drawing is done in black ink.

First name only **Audrey** ..... Aged **9** .....

Don't put your last name here



## 8. Biodiversity Impacts – Sourced from F6 Action EIS submission

F6 Action firmly objects to the F6 Extension project due to irreversible impact to our natural environment on the following reasonings. The following are concerns raised against the EIS (as response to the SEARS) which have not at all been addressed within the PIR. It is as if the entire set of concerns have been ignored. For this reason, we are resubmitting the entire set of concerns so that you may read them again, and request to have these concerns fully addressed.

### **Concerns Open Space – The Corridor**

The areas of open space and vegetation referred to as **The Corridor** is in the hands of the RMS having been set aside for a road which is now going underground. Our concerns here are that once the F6 is complete there is an unknown factor or what will happen to this open space under the RMS control. It would be a tragedy if this is sold off to developers. The surrounding area is bad enough now with dwindling public assessable open spaces and high rises, it would be good to see the land dedicated to nature itself and wetlands restored.

The RMS must inform the public what its future plans are for this land which is currently publicly accessible green space.

### **Swamps and wetlands**

Certain swamps may lose water as a result of construction activity re: the F6 and is there a plan to save the creatures within the swamps such as fish, yabbies, turtles, eels, birds? Are there plans to manage those swamps affected by the F6 road works?

### **ENVIRONMENT**

There will be huge impacts on our local environment's flora and fauna.

Residents walk through the wetland areas on a number of occasions and appreciate the beauty of the area. To divert the wetland area is not acceptable to animal habitats.

The swamp mahogany tree in Bicentennial Park is listed as endangered, as is the swamp oak floodplain in Kings Road Wetland. It is expected that 237 native trees will be removed, 41 having been identified as high retention value. And 21 non-native trees would be removed for construction.



All trees on President Avenue will be removed. It will take many years for the vegetation to regrow. Threatened species such as the Grey Headed Flying Fox, the Green and Golden Bell Frog, and the Southern Myotis Flying Bat are mentioned in the EIS. Habitat changes will impact on their environment.

The EIS addresses threatened and endangered animals, but does not include all native animals. Some animals will be mobile enough to be able to move away; some animals however will be killed from construction vehicles.

#### **More care required for all fauna**

Upon reading the document Appendix H there seems to be an attitude of: well if it doesn't get out of the way then it's toast. This includes the slow-moving animals, insects, worms, frogs, lizards, whatever is currently there and it will be *en-masse* destruction.

*'During the construction of the project, injury or mortality to fauna may occur as a result of direct collision with vehicles and equipment within construction compounds. Some mobile species may be able to move away quickly and easily, such as some birds. However, other less mobile species, or those which have high fidelity with their home range, may be slower to move away or may not relocate at all, potentially resulting in injury or mortality of the individual'.*

*'Actions such as fauna rescue and relocation during dewatering and bunding of the waterway in the President Avenue construction ancillary facility would reduce potential injury to aquatic fauna (e.g. Eastern Longnecked Turtle). Mortality of fish and turtles are expected to be minimised through standard rescue and release protocols.'*

*(App H pg. 8-6)*

There are no details of who will be on location to help with the injured? Or even ensure there is next to no deaths or injuries to any creature through proper search and clear methods before the bulldozers enter? The mitigating measures for the slow in this document seem be quite minimal. You have 2 lines of text that apparently will deal with thousands and thousands of lives without a real plan.

The M4 had a similar case with deaths of dozens of Ibis and babies during their breeding season that could not get out of the way or were scared into traffic on the M4 when clearing



of their breeding ground. It was only due to public intervention to National Parks that saved the remaining birds and their young in nests incapable of leaving by stopping the bulldozers until breeding season was over and the young able to leave. We would like to see some ownership of who will be on the ground to assist the slow and the incapable, and how they will ensure maximum survival of fauna.

### Long Finned Eel – and other eels



Although its home is generally in Centennial Park, when it's time to breed the long-finned eel move through various water and surface areas towards and ending in Botany Bay, then the long journey to the Pacific near Tonga to breed at their end of their lives and once born the young find their way back to Centennial Park via Botany Bay to live many years before they too take that path.

The article link is here - <https://www.smh.com.au/environment/conservation/a-very-fast-drain-to-the-south-pacific-20111105-1n11j.html>

The canals and ponds around the subject area are also frequented by eels and sadly at times they die as a result of being isolated and caught up dry. There is no mention of any eels in





the document yet we have observed they are located in the area, and they are definitely extant in Bicentennial Ponds.

## Chapter 12

*Re: SEARS requirement #6 (Pg. 12-1): The biodiversity assessment must consider impacts on:*

- *wetland vegetation communities over the entire alignment of the tunnel; and*
- *wetland fauna habitat*

F6 Action objects to the entire response to the SEARS only focusing on endangered fauna. The SEARS requirement clearly asks for a more general response as “wetland fauna habitat” must by definition include a listing of non-endangered fauna. There is a very large biomass in existence, especially at the north and south ends of the project, which have been summarily ignored in the EIS.

*Re: SEARS requirement #10 (Pg. 12-1): The EIS must include design opportunities for improvement of the Rockdale Wetlands including measures to reduce the potential for de-oxygenation of and increased nutrient inputs to waters.*

Seeing as the entire water body at Bicentennial Park will be destroyed, we don’t see how this provides “improvement of the Rockdale Wetlands”. On the basis of this alone, the entire project should be disallowed. We object to the planned removal of Bicentennial Ponds because there is no way such a habitat could be successfully recreated with the planned President Ave tunnel exit sitting under and next to it.

### Section 12.1.1

*Re: State Environmental Planning Policy (Coastal Management) 2018 (Coastal Management SEPP)*

*“The project is State significant infrastructure and is permissible without consent; therefore Clause 10(1) and Clause 11(1) do not apply once it is approved by the Minister for Planning.” (Pg. 12-4)*

This project cannot satisfy the Coastal Management SEPP requirements: “development will not significantly impact on: a) the biophysical, hydrological or ecological integrity of the adjacent coastal wetland or littoral rainforest, or b) the quantity and quality of surface and ground water flows to and from the adjacent coastal wetland or littoral rainforest.” But



because the project seems to be classified as State Significant Infrastructure, these requirements are being ignored.

The business case for the F6 is therefore flawed from the start, and it can hardly be considered to be SSI when there are better alternatives.

Since the F6 is not qualified to be SSI, then the RMS must satisfy the 2018 Coastal Management SEPP within its EIS. If it cannot, we urge NSW Planning to not approve this project.

#### Section 12.2.1

*Re: Five wetlands (listed under the Directory of Nationally Important Wetlands) are located within the study area (refer to Figure 12-5), including:*

*Scarborough Park North Wetland (Locally important)*

*The Coastal Management SEPP identifies the wetlands within Rockdale Bicentennial Park and Scarborough Park North, as well as other wetlands within the vicinity of the project, as “coastal wetlands”. (Pg. 12-9)*

Nevertheless the project proposes to demolish 0.77 ha of this area (also known as Patmore Swamp). This area is further listed as a heritage area. We object to any destruction of any part of Patmore Swamp.

*Re: State or regionally significant biodiversity links (connectivity)*

*The study area does not contain any connectivity features. However, there is a corridor of land extending south from Brighton-Le-Sands to Ramsgate that is primarily open space and is a local wildlife corridor. This corridor forms part of the existing F6 reserved corridor. The open space and minor areas of native vegetation do not connect large patches of intact native vegetation or habitat. However this is likely to function as ‘stepping stones’ between habitats for relatively common urban wildlife.*

F6 Action objects to the completely incorrect statement that the study area does not contain any connectivity features. This is totally false. Fish in the area are very mobile and follow drainage routes from Kings Rd wetlands south through Bicentennial Ponds, Patmore Swamp, Scarborough Ponds and all the way south into Georges River. Murray River short-neck turtles which live in Bicentennial Ponds have even got their own steps cut into the weir between it and Patmore Swamp, so their existence is quite a known fact to Council.



Migratory birds such as Great Egrets and Spoonbills have been identified in both Bicentennial Ponds and in Patmore Swamp. What a bald-faced lie to say that the study area is devoid of connectivity features.

The fact that this type of urban wildlife which depend on these areas are classified as “relatively common” do not mean that they are not important in their total numbers. The destruction of these habitats leaves fauna as a whole with less space in which to exist, thereby making “relatively common” species less common over time. We object to this wholesale destruction of habitat.

#### Section 12.3.2

*“Although there is potential for some injury or mortality of fauna species, the project is unlikely to result in a large number of fauna injury or mortality incidents, as the majority of the project would be constructed underground.” (Pg. 12-30)*

However at the exit point at Bicentennial Park, the project is either above ground or is very close to ground level. There is a high potential for loss of animal life or injuries in this location. I object that there is no recognition of this fact. This section references further section 12-6 for management of impacts, which fails to then cover the entire set of fauna.

#### Section 12.3.2

##### *Impact on migratory species*

*While the species do occasionally occur close to the project, the species have not been observed to occur within the construction boundary. (Pg. 12-31)*

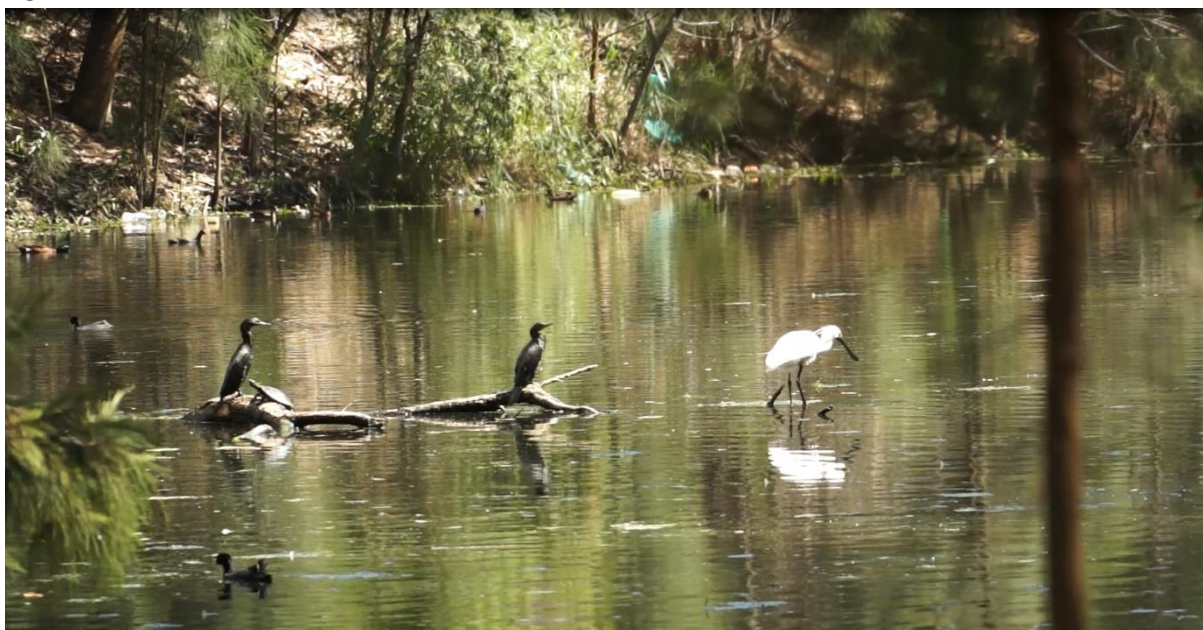
Just because RMS has not observed them does not mean that migratory species do not exist here. Here is an example of a recent photo of a migratory species taken by locals, within your construction boundary. We have several other examples taken over the years.





Great Egret in breeding plumage, Northern Patmore Swamp (very close to President Ave) 9-11-2018

Here's another taken across the road, as evidence that over the years migratory birds have been sighted here.



Spoonbill and other birds and turtle, Bicentennial Ponds, 2-02-2014

Section 12.3.2



### *Impact on migratory species (cont.)*

*Indirect impacts that may potentially impact these species include hydrological changes, such as a reduction in groundwater supply to wetlands that supply habitat for a species. (Pg. 12-31)*

Absolutely, there is bound to be a reduction in groundwater conditions as RMS will have to drain the above pictured Bicentennial Ponds to put in their President Ave exit. However, there is no suggestion about how this situation is to be mitigated, even though it is bound to directly impact species that exist within the construction boundary and beyond, so we object to this project on the basis that this one-line statement, is hardly a comprehensive assessment and is not at all being mitigated.

### Section 12.3.2

#### *Southern Myotis*

*Impacts to threatened fauna are not expected during construction due to the limited number of threatened species records in the vicinity of the project... (Pg. 12-32)*

As we have already seen, RMS are wrong about the identification of migratory birds within the area. It is a strong suggestion that they are wrong about other things, such as “limited number of threatened species” – as records are patchy and are not indicative of the true state of affairs.

We object that RMS may bulldoze the area without a real understanding of what is being lost.

### Section 12.3.3

*Table 12-3, row “Wetland within Rockdale Bicentennial Park through Rockdale Wetlands”*

This entire row indicates that Bicentennial Ponds will be cut in two and “would obstruct local fish passage. It would also temporarily reduce water circulation” before going on to say that survival is unlikely to be impacted. See my comments below.

### Appendix H Section 8.5

*Aquatic and semi-aquatic fauna dependant on this pond would be segregated into two populations, occupying a 1-hectare northern pool and 1-hectare southern pool. The pond would be restored after the roadway is covered, however there remains a risk to the*





*northern pool given the isolation during the construction period. The size of the refuge pools, may not be large enough to sustain current population sizes, increasing risk of mortality to those species present.*

*However, species currently inhabiting the pond are likely to be those tolerant of urban pressures, such as poor water quality, shallow habitat and disconnection from any large flowing river. As such, these species are expected to adapt to the change in habitat and ecology.*

This is hardly believable. Fish and native turtles that inhabit Bicentennial Ponds use this as part of corridor from Kings Road into Patmore Swamp and further south. The turtles have their own steps built into the weir, so their presence is not unknown.

#### 12.4.4

*Impact on groundwater dependent ecosystems (Pg. 12-41)*

*For the Rockdale Wetlands area, groundwater modelling predicts the long-term surface water drawdown as being between 0.28 metres and 0.32 meters. However, as described in section 12.3.4 the wetlands are not classified as high priority and are highly modified to **act as flood mitigation basins**. Consequently the predicted groundwater drawdown would be less than anticipated because of the **continual inflow of stormwater and floodwaters**.*

This is a significant surface water drawdown identified. Endangered ecological communities populate this space and yet they are not classified as high priority - it would seem that this is only so RMS can remove them without opposition. For if they were to be left standing, this loss of ground water would quite destroy them. See RMS own text next paragraph.

*Long term dewatering caused by tunnel drainage is predicted to **lower the water table and water pressure levels** within the Hawkesbury Sandstone, **reducing the amount of groundwater available for some shallow rooted plants**. The minimum depth of the water table underlying the majority of the construction boundary is on average one metre below ground surface. Areas where the water table is shallow, such as along the **Rockdale Wetlands corridor**, are **typically subjected to flood inundation** which would provide water periodically for shallow rooted plants that may have some groundwater dependence. At other more elevated topographic areas, such as parts of Arncliffe, the water table is much deeper below ground surface and consequently flora is unlikely to be dependent on groundwater.*



There seems to be some confusion here, because RMS later talks about rebuilding wetlands over this space (see Section 13 below), which would seem quite impossible if the water table is lowered to the degree they mention.

Furthermore, a really important consideration to the local area, is that many, many residences are built very close to the Rockdale Wetlands. The wetlands strip is the lowest point between the Princes Hwy and the dune swales of Brighton. By default, water runs to the lowest point. And here, at Bicentennial Ponds, lowest point between Princes Hwy and The Grand Parade, RMS have chosen to locate their exit point to President Ave. This probably does sound rather a poor choice – and it is.

The reason this area is “**typically subjected to flood inundation**” is because of the above. The reason why the wetlands “**act as flood mitigation basins**” is because they were the smartest choice and most suitable area to be set aside to do so.

RMS will face an uphill battle (pardon the pun) in keeping water out of this low-lying area.

If they raise the area’s height, which we understand they may do (*13.4.2 The earthworks to raise President Avenue would have maximum slopes of 1:4 to visually integrate this level change with the surrounding open space. Pg. 13-23*) they will still have a battle to keep water out of the tunnels on an ongoing basis, simply due to the relief of the area. (*This is also a serious concern for differential settlement on adjacent buildings. Potential damage to family homes that are routinely denied by the RMS*).

We predict that this will not be a battle that RMS will win. Nature will see to that.

Most importantly, if this area which was purposely modified to act as a flood mitigation basin, is now being kept dry, or is raised, then, where is the water going to go? We believe that all residents in the local area will be affected. All the surrounding houses and flats are separated from the Rockdale Wetland area by a very low gradient slope.

We are all going to be flooded out at the next heavy rains after and maybe even during construction. We already get some degree of flooding with heavy storms, but by the time the F6 Stage 1 is built, we will be underwater at the next big storm.

We vehemently object to the building of this stub of a road when it is going to cause such huge flooding impacts on residents in the future.

Section 12.5



*This BDAR assessed the type and number of credits using BAM. The following PCTs require offsetting in accordance with the online credit calculator:*

- *Around 0.47 hectares of 1232 Swamp Oak floodplain swamp forest, Sydney Basin Bioregion and South-East Corner Bioregion (8 credits)*
- *Around 0.30 hectares of 1795 Swamp Mahogany / Cabbage Tree Palm - Cheese Tree – Swamp Oak tall open forest on poorly drained coastal alluvium in the Sydney basin (10 credits)*
- *Around 0.77 hectares of 1808 Common Reed on the margins of estuaries and brackish lagoons along the New South Wales coastline (8 credits).*

The Biodiversity Conservation Act 2016 is a blueprint for environmental destruction. The RMS is proposing that the NSW Government plant grass or some other environmental poor choice, somewhere else to somehow offset the loss of these significant trees and reeds.

Well that is no compensation for this area. We are losing significant trees and other flora. We are losing endangered ecological communities. They are small areas to be sure, but that is partly because they are endangered and do not exist in large areas any longer. By removing these flora, these communities become much further endangered, as there are less of them left. It is a travesty to plant other flora somewhere else to offset this loss of an ecosystem, because this ecosystem can never be recreated. It is unique to this location and its loss to us will remain a loss for always, no matter where the NSW Government decides to plant its replacement poppies.

We object to this local loss of endangered ecological communities, not just for us, but because it reduces an already reduced number of these communities.

#### Section 13.1.2

##### *LCZ4: Rockdale Bicentennial and Scarborough Parks (Pg. 13-14)*

- *Land generally low lying and flat, associated with the Rockdale Wetlands which form part of a system of tidal and freshwater swamps*
- ***Wetlands considered to be of 'high visual quality'***
- *Dense vegetation encloses views to the wetlands, and east/west inter-visibility between the open spaces is limited, also creates a landscape and visual buffer between industrial and commercial uses to the west and the coastal low density*



*residential areas to the east at Brighton-Le-Sands. **There are a number of high retention value trees located in this LCZ** (refer to Figure 13-40)*

#### Section 13.4.2

##### *Landscape treatments (Pg.13-23)*

- *Supplementary tree planting and screening would be provided along President Avenue to **offset the tree removal** and to re-establish a visual screen along the corridor*
- *A section of the existing **wetland pond would be rebuilt** at completion of the F6 works to restore this landscape*

RMS own assessment is that these wetlands are considered to be of high visual quality. Furthermore there are a number of high retention value trees located in this area. This supports the earlier point that RMS cannot easily recreate what is already there. There is little chance that they will be able to substitute another set of wetlands of high visual quality and replace the high retention value trees with equally high value trees. Trees furthermore, don't grow overnight. "Offsetting" is a myth.

Rebuilding wetlands are near impossible, to say the least, and furthermore RMS laughably wants to do this with a tunnel or exit running underneath. The point about wetlands is that they need to hold water. The point about tunnels is that they need to be dry. Rebuilding the wetlands here, is another myth.

Not to mention that even if RMS managed to actually do this (impossible task), all the existing fauna that live here will die once they remove the existing flora. So, who knows what will be left to inhabit the newly landscaped space? Certainly nothing like the current biodiversity would be found.

On the grounds above, we object to the destruction of the existing area's flora.

#### Section 12-6

##### *Management of impacts (Pg. 12-45)*

The Construction Flora and Fauna Management Plan (CFFMP) is mentioned here but its content list (Pg. 12-45) does not seem to cover the relocation of any fauna except aquatic fauna. This would mean that the very large number of lizards, for example, that inhabit both the east and west banks of Bicentennial Ponds have a high probability of losing their



lives. I object that this project does not care to detail how it will save the lizards and other fauna that inhabit the ground level of this area.

Furthermore, the CFFMP must be detailed to some degree here within the EIS before some judgement can be made about its suitability. If the CFFMP cannot be detailed because studies are insufficient, then these studies must be done and the CFFMP drafted, before the EIS is approved. Otherwise I object to the project on the grounds that there is no clear indication of what flora and fauna will be protected or saved, nor how.

#### Section 12.7

*Environmental risk assessment (Pg. 12-47) – refer table below*

**Table 12-18 Environmental risk analysis – Biodiversity**

Summary of impact	Construction/ operation	Management and mitigation reference	Likelihood	Consequence	Residual risk
Vegetation clearing	Construction and operation	B1, B4	Certain	Minor	Medium
Deferral of Green and Golden Bell Frog habitat reinstatement	Construction	B6	Certain	Minor	Medium
Inadvertent impacts on adjacent habitat or vegetation	Construction	B3, B4	Unlikely	Minor	Low

Considering that we have just clarified that RMS have identified endangered ecological communities in the area which they are proposing to clear of vegetation – how is it that the Consequence rating of “Vegetation clearing” is classed as “Minor” ? On what basis is this inferred? F6 Action prefer a consequence rating of “Catastrophic” – which would be more correct.

Since the very first line is incorrect, we ask the DPE to examine closely all the other assessments that exist within this document. Careless, throw-away assessments should be discarded.

We object to any project expecting to proceed based on this assessment, as this assessment does not at all correctly reflect the actual state of affairs.





## Appendix K

### 6.1 Altered groundwater recharge (Pg. 6-1)

*The development of impervious surfaces along the alignment such as the President Avenue road widening and intersection would increase the volume and rate of runoff, locally reducing groundwater recharge.*

Nowhere in the EIS response document does it tie in the reduced groundwater recharge with the health of the Kings Rd Wetlands and the remaining Patmore Swamp.

*Appendix H Table 8-7 extract (Pg. 8-18)*

Impact	Biodiversity values	Serious and irreversible impact	Nature of impact	Extent of impact	Duration	Does the project constitute or exacerbate a key threatened process?
Impacts not covered by the BAM						
Loss of groundwater due to drawdown	Groundwater dependent ecosystems Wetland habitat at Landing Lights Wetland Native vegetation at Rockdale	No	Indirect	Local	Long term During construction Post construction	No

The above says there is no serious and irreversible impact from the reduced groundwater situation at Kings Rd Wetlands and the remaining Patmore Swamp. How is one to believe the above?

Further, refer the following table extracts:

*Appendix H Table 8-7 extract (Pg. 8-16)*



Impact	Biodiversity values	Serious and irreversible impact	Nature of impact	Extent of impact	Duration	Does the project constitute or exacerbate a key threatened process?
Native vegetation and habitat						
Removal of native vegetation and habitat	Swamp Sclerophyll Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and Southeast Corner Bioregions Swamp Oak Floodplain Forest of the NSW North Coast, Sydney Basin and Southeast Corner Bioregions	No	Direct	Site based	Short term Long term During construction	Clearing of native vegetation Removal of dead wood and dead trees

Appendix H Table 8-7 extract (Pg. 8-18)

Impact	Biodiversity values	Serious and irreversible impact	Nature of impact	Extent of impact	Duration	Does the project constitute or exacerbate a key threatened process?
Impacts not covered by the BAM						
Loss of aquatic habitat	Scarborough Park North Unnamed waterway at Rockdale	No	Direct	Site based	Short term During and post construction	No

#### Appendix H 10.1 Offset for Serious and Irreversible Impacts (SAIL)

*The development does not have any Serious and Irreversible Impacts (SAIL). No offsets for matters subject to SAIL are required.*

We strongly object to the above table and statement. We have clear endangered ecological communities listed in the area. RMS is planning to bulldoze these areas – and claim that (a) the nature of the impact is direct (which is correct) but (b) that there are no Serious and Irreversible Impacts (SAIL). How is anyone to believe this?



## 12.7 Environmental risk assessment (Pg 12-47)

**Table 12-18 Environmental risk analysis – Biodiversity**

Summary of impact	Construction/ operation	Management and mitigation reference	Likelihood	Consequence	Residual risk
Vegetation clearing	Construction and operation	B1, B4	Certain	Minor	Medium
Deferral of Green and Golden Bell Frog habitat reinstatement	Construction	B6	Certain	Minor	Medium
Inadvertent impacts on adjacent habitat or vegetation	Construction	B3, B4	Unlikely	Minor	Low
Transport of weeds and pathogens from the site to adjacent vegetation	Construction	B3, B4	Unlikely	Moderate	Low
Sedimentation and contaminated and/or nutrient rich run-off to aquatic habitats	Construction and operation	B3, B4	Likely	Minor	Low
Noise, dust or light spill	Construction and operation	B3, B4	Likely	Minor	Low
Vehicle strike	Construction and operation	B3, B4	Unlikely	Moderate	Low
Trampling of threatened flora species	Construction and operation	B3, B4	Unlikely	Minor	Low
Disturbance to specialist breeding and foraging habitat for the Grey-headed Flying-fox	Construction and operation	B1, B4	Unlikely	Moderate	Low

Amazingly the change of water flows is never mentioned in the above table.

It is clear from scientific studies that long term drawdown reduces biodiversity, yet this risk never makes it into the above table.

What more could be missing from this risk table? It is unfair to require the general public to have specialist knowledge to pick up omissions such as the one above.



## Ch. 12 Biodiversity

### **More care required for all flora and fauna**

We need to have confidence that all the biomass in the area is looked after not just the threatened species. There is a concentration of effort around threatened species, but millions of other birds, reptiles, amphibians and fish will die due to this project. Yet there is little except one-line assurances that certain types of animals will be preserved.

#### Section 17.1.7 { Pg. 17-10 }

*When the tunnel is sufficiently deep or the ground is sufficiently stiff, the surface movements can be negligible. It is also possible that upward movement (heave) can be induced by the release of high in-situ stresses in the rock mass. In the Sydney Basin substantial horizontal in situ stresses are present at shallow depths, exceeding the vertical stress due to gravity (Chesnut, 1983 and Enever et al., 1984). This can cause the sides of a tunnel excavation to move inwards (converge), bringing the tunnel walls together and causing the crown to move upwards.*

*Further investigations to support the detailed design of the project would confirm predicted ground movements.*

Seeing as the tunnel would be fairly close to the surface in some parts, it would be premature to grant any go ahead to the project without a clear indication of dimensions of settlement trough, due to water loss and the actual excavation, along the entire line of the tunnel. The ground is also not “sufficiently stiff” in the area leading up to and including the proposed President Ave exit. RMS would also need to indicate how they will compensate owners of buildings thus affected. This needs to be added to the project budget. If this is not done, then we object on the basis that a “wait and see” attitude is not in the public interest.

#### Section 17.2.1 (Pg. 17-12)

*The tunnel alignment avoids the underlying palaeochannels and unsuitable geology that lies to the east of the project alignment.*

This statement is incorrect because it ignores that the exit onto President Ave (a major feature) is planned on unsuitable geology. We object that such statements are made, as they give the impression that all is well with the RMS plan.

#### Section 17.2.4 (Pg. 17-22)

*Rates of water inflow have been monitored in recent years from several unlined tunnels in the Sydney area with similar geology, hydrogeology and construction to that proposed for the project.*



Following this statement is Table 17-4 that shows inflows for the Eastern Distributor, Lane Cove Tunnel and the like. It is unlikely that any of the tunnels mentioned in the table have an exit planned in a low-lying swamp area, therefore we object to the idea that low water inflow rates can be expected. We object to such a poor comparison being made, to give the impression that all will be well during tunnel operation.

Fig 17-4

Refer figure below in which it is clear that Kings Rd wetland drains south into Scarborough Ponds.



Kings Rd Wetland will suffer lack of water drained off by the construction – how does RMS intend to keep this upstream area at an appropriate water level during the construction? This is never clearly indicated in the EIS response.

If, as we expect Kings Rd Wetland becomes cut off from its drainage system, it is unlikely to survive into the long term, and together with its demise goes all of the flora and fauna dependent on it. By the time the project is in its operation phase, Kings Rd wetland will be nothing more than a stagnant pond.

Furthermore it should be noted that wetlands recreation is never very successful and costs will be high. The “new” ponds created will be (due to their positioning on top of a tunnel exit) likely nothing but goldfish ponds as they will not act as water depositories in the way that wetlands do. All through-flow of drainage will have been eliminated and the health of these water bodies will be poor by definition.





We object to this callous disregard of management of this last remnant of wetland in the local area.

#### 18.1.2 Project features

*Each of the construction ancillary facilities would also include a groundwater pre-treatment basin.*

Nowhere in the EIS response does RMS discuss how the smell emanating from this stagnant water would be managed. This is going to impact residents especially those in the surrounding areas, and those who seek to use the nearby remaining areas for recreation. If this basin is a covered concrete structure, then, what an eyesore it is going to be.

We object to this disregard for aesthetic and comfort, and to this project as a whole.

#### 18.3.1 Surface Water

**Table 18-6 Construction surface water balance**

Construction Ancillary Facility	Surface Water inputs (ML/year)	Groundwater inputs (ML/year)	Groundwater / Surface Water losses following reuse (ML/year)	Total discharge volume (ML/year)
C1	37	193	1	229
C2	37	84	2	119
C3	140	Variable – 265 typical <sup>1</sup>	5	400
C4	0.9	0	Negligible	0.9
C5	0.6	0	Negligible	0.6
C6	1.8	0	Negligible	1.8

In the above table, it must be noted that the total discharge volume at C3 (President Ave exit area) is huge at 400 ML/yr. Surely DPE must want to see a detailed plan for management of these inflows. Yet RMS indicates one will only be available with detailed design. Surely a feasibility must be carried out before the project can be approved.

#### 18.3.1 Surface Water (pg. 18-17)

*During dry periods, water levels in the Rockdale wetland are controlled by local groundwater levels and the Rockdale wetland weir. Therefore an increased inflow from construction discharges is*



*unlikely to significantly affect the water level within the pond with the additional flow discharging over the weir and being conveyed to the Northern Scarborough Pond.*

Firstly it must be noted that the entire relief of the area will be changed due to the raising of President Ave around the exit. Therefore *“the additional flow discharging over the weir”* is a bit of a rubbish statement as the new flows have not been adequately mapped. Furthermore the entire Bicentennial Ponds is going to be drained to achieve this exit so saying inflow is *“unlikely to significantly affect the water level”* is not really saying anything much.

This EIS response also does not mention what happens here during wet periods. Or during yearly flooding events.

We encourage the DPE to reject this project as being poorly thought out and poorly understood.

#### *18.3.1 Surface Water (Pg 18-18)*

*To manage this risk, it is assumed discharges from the construction water treatment plant at the President Avenue construction ancillary facility (C3) are also directed to Muddy Creek.*

How is this really going to happen as the C3 area is separated from Muddy Creek by higher ground. Is RMS going to somehow tunnel the water through? This assumption should not be made unless it can be demonstrated how such a drainage can be made to happen.

We object to the scattering of poor assumptions throughout this document, without solid backing feasibility analysis.

#### *18.3.1 Surface Water (Pg 18-20)*

Provided that the treatment measures discussed in Section 18.6 achieve the recommended discharge criteria, tunnel wastewater discharges during construction are likely to have a negligible impact on receiving water quality.

Here's another assumption couched in a "Provided that". How is RMS going to ensure negligible impact on receiving water quality? This is never stated. Such an unfinished document should really only be rejected outright. We object to this project on this basis.

#### *18.4.1 Surface Water (Pg. 18-26) - Operation*

*This section identifies and assesses the potential operation phase impacts to the hydrology, geomorphology, natural processes and water quality of surface waters.*



#### 18.3.2 Flooding (Pg. 18-24) - Construction

*The construction of the project would generate a significant amount of spoil which would need to be temporarily stored in stockpile areas. Stockpiles located on the floodplain have the potential to obstruct floodwater and thereby alter flooding patterns. Inundation of stockpile areas by floodwater can also lead to significant quantities of material being washed into the receiving drainage lines and waterways.*

It should be clarified that wetlands act as filters, trapping pollutants and ensuring they never reach the ocean. So, dismantling wetlands are bound to release tremendous amounts of pollutants as they have been in place for years. This raises 2 issues. One is the ability of RMS to decontaminate the extracted pollutants from spoil before safe disposal (Construction phase), not to mention the complication of flooding of such contaminated spoil. The other is the loss of this filtration capacity (in Operation) from the destruction of wetlands areas at Bicentennial Ponds and Patmore Swamp.

Neither of these questions are adequately addressed in this EIS Response. We encourage the DPE to reject this proposal as it is so poorly modelled.

#### 18.3.2 Flooding (Pg. 18-24) - Construction

*A dedicated shared bridge would be constructed over President Avenue and a section of Scarborough Park North. In order to construct the bridge it would be necessary to provide a temporary access road, as well as a series of working pads within Scarborough Park North in an area that is inundated by floodwater that surcharges to Scarborough Ponds during storms. The inundation of the access road and working pads by floodwater has the potential to cause the transport of sediment and construction materials into the receiving waterways as well as **damage to machinery and delays to the project timetable**. Conversely, raising the access road and working pads to reduce the potential for flooding to the work areas would have the potential to displace floodwaters and **exacerbate flood behaviour in adjacent development**.*

It is clear from the above that Scarborough Park North (Patmore Swamp) will be further vandalised to create “working pads” besides the loss of a part of this area for the widening of President Ave. Let us remind ourselves that this is heritage area. RMS should not be casually destroying it for “working pads”. Neither of the proposed options (in bold above) are satisfactory. We object that such second-class mitigations are being bandied around.

#### 18.3.2 Flooding (Pg. 18-24)

*Potential increases in peak flood levels could have social and economic impacts on the surrounding community such as damage to residential properties and increased need for emergency response procedures from state emergency services during times of flood.*



How wonderful for our residents to have to put up with this. RMS would also need to indicate how they will compensate affected residents and public services. This needs to be added to the project budget. If this is not done, then we object on the basis that a “wait and see” attitude is not in the public interest.

### 18.3.2 Flooding

#### *Assessment of potential construction impacts*

*Table 18-11 Potential construction impacts on flooding (Pg. 18-25)*

There is mention of impact on “peak flood levels at residential and commercial properties” yet there is no mention of compensation, or how this would be assessed. RMS would also need to indicate how they will compensate affected properties. This needs to be added to the project budget. If this is not done, then we object on the basis that a “wait and see” attitude is not acceptable.

*Table 18-11 Potential construction impacts on flooding – extract (Pg. 18-25)*

President Avenue construction ancillary facility (C3)	Site facilities Spoil management Cut and cover structures Surface earthworks Bridge structures	Potential displacement of water due to blocking effects of the construction site. Potential increase in peak flood levels in 12 residential properties and one industrial property by a maximum of 20 mm. Potential increase in above-floor inundation and flood damages in the affected properties.
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This row referring to C3 grossly underestimates the potential flooding situation. Refer our comments on Figure 17-4 (Pg. 17-15) on the changed water pooling due to subdivision of Bicentennial Ponds sub-catchment.

We object to such poor assessments and careless statements being made in an EIS response of this magnitude and importance.

### 18.4.1 Surface Water

#### *Tunnel Surface water (pg. 18-29)*

*The volume and quality of tunnel surface water would be highly variable. Surface water discharge volumes to the Cooks River would therefore also be highly variable with some highly polluted surface water potentially removed for treatment and disposal elsewhere. It is therefore **not practical to assess** the quantity of pollutants which could potentially be discharged.*

It seems that RMS has decided that pollution levels could be pretty high, but it is in the “too hard basket” to assess what quantity of pollutants could potentially be discharged. It is amazing that RMS





would decide on a “suck it and see” attitude to pollutant discharge, but this seems to be what they have put on offer.

We as residents who will have to live with the outcome, completely reject this approach and we object. RMS has a duty of care to do careful modelling in this arena.

### **18 Surface water and flooding**

#### **18.4 Potential impacts – operation**

Throughout this whole section there is no mention of the potential impacts of water related changes on flora, fauna and biodiversity while the project is in operation. However, it is clear that there will be major impacts from changed water flows, and this is never discussed anywhere with any clarity in the entire EIS response. The impacts discussed in Appendix H Biodiversity (Table 12-18) doesn’t even mention this as an impact to be considered.

How can this be acceptable? We object that the EIS response is incomplete and glosses over major assessment work such as this.

Furthermore, see below: The fact that the entire Bicentennial Ponds sub-catchment will be split into two, by the raising of the tunnel exit and President Ave ground level (to prevent water ingress) – is never discussed anywhere in the EIS response.

Figure 17-4 (Pg. 17-15) – red text is from this submission response:







Refer above – the Bicentennial Ponds sub-catchment becomes split due to terraforming works at the exit.



Refer above – this potentially changes the way that water flows during rains and produces likely new pooling areas (the new lowest ground).

Especially on the west of the exit, where there are houses and residences already in low lying areas that experience high water levels during very heavy rains, this will cause flooding and flooding related damage in these households with the new profile.

Nowhere in this EIS response, is this assessed or even acknowledged. F6 Action object to such a poor modelling of likely outcomes. Furthermore, is RMS then going to compensate these households for their damage? What is that likely cost and how does that impact the operational budget?

On the basis of all the concerns raised above, F6 Action OBJECT to the F6 Extension Stage 1 project. It is not in the public interest, and the public have clearly stated a desire to have public transport to be the alternative that is selected. It is time that the NSW government actually listened to the people's feedback on this project.