

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

February 27, 2021

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

I object to the project for the following reasons:

1. **Insufficient time** has been allowed for sufficient review of the EIS, particularly given the size of the documents. The project should be re-exhibited well after the COVID-19 crisis has passed.
2. The EIS refers to a Phase 2 assessment of **contamination** risks. Given the potential significance of contamination risks, the **EIS should be reissued** for public consultation after incorporation of the findings of this assessment.
  - a. As I live close to contaminated sites in the Flat Rock Gully Area, construction activities at the Flat Rock Gully dive site and transportation of spoils risks disturbance of contaminated material are of particular concern.
  - b. Installation of real time air quality monitoring and alerting at Bicentennial Reserve with real time and historical data publicly available over the internet should be a requirement of any approval.
3. There is no requirement for **filtration** of the ventilation stacks. **As a formal condition of approval**, ventilation stacks must be constructed to enable low cost retro-fitting of **filtration** of the ventilation stacks, should air quality monitoring demonstrate unacceptable levels of pollutants from the project.
4. There is no consideration of **mass transit alternatives** and the **business case** has not been presented to the public. Mass transit alternatives may provide better outcomes for a sustainable society, the environment and provide better returns on tax payer funding.
5. Little evidence has been presented that the project will alleviate **congestion**. I am concerned that this project and the Warringah Freeway Upgrade is going to result in “rat running” through many of the local streets in Naremburn.
6. There is no requirement for monitoring of **subsidence, tilt** (angular distortion), or real time **vibration** to demonstrate the actual (as opposed to modelled) impact of construction and operations. As I live above the proposed tunnel, I believe such monitoring is essential to ensure operations are conducted with the expected standards, and if not, provides a basis for associating any property damage to construction activities.

7. **Subsidence, noise and vibration** impacts. As my property is above the tunnel, this is of major concern to me.
- a. **As a formal condition of approval**, all properties above and within 100m of the tunnel route and those forecast to be impacted, must offered a free and independent pre-construction property condition survey providing a clear record of a property's condition before work starts. If any damage caused by even very slight subsidence (Table 16.8) or excessive vibration, the damage must be addressed and rectified at no cost to the property owner. An independent panel must be set up to oversee the claims process.
  - b. Installation of unattended real time vibration monitoring at properties along the construction route on an opt-in/ requested basis with real time and historical data publicly available over the internet should be a requirement of any approval.
  - c. Installation of unattended real time noise monitoring at receivers expected to be impacted by noise on an opt-in basis with real time real time and historical data publicly available over the internet should be a requirement of any approval.
  - d. An alternative route (eg following the Warringah Freeway corridor further north) should be considered to reduce the impact of vibration and/or subsidence the number of residences in the Naremburn heritage area. A route that eliminates the Flat Rock Gully dive site could avoid any of the contamination and environmental risks associated with the use of the Flat Rock Gully dive site.
8. Potential damage to storm water, or sewerage and water infrastructure due to subsidence has not been addressed. (eg between Market St and Flat Rock Gully Naremburn). **As a formal condition of approval**, tilt meters should be installed prior to construction along these easements and monitored throughout the construction and operational periods, with regular CCTV inspection of these lines for damage. Tilt meter data and inspection reports should be freely available to the public on the internet.
9. **Feasible and reasonable** construction noise and vibration mitigation.
- a. An independent person must assess if a mitigation measure is not "feasible and reasonable"
  - b. In the event that feasible and reasonable mitigations are not possible, then adequate compensation, including alternative and equivalent accommodation must be provided for the period of disruption to affected residents.
  - c. A process has not been provided addressing how the public will be compensated should it be accepted by stakeholders that there are no 'feasible and reasonable' mitigations possible.
  - d. There must be a process outlined on the steps will be taken should actual noise and vibration levels exceed acceptable limits
  - e. **As a formal condition of approval**, independent complaints commission / ombudsman is required to ensure that public interests are protected from the impact of noise and vibration, with powers to enforce timely property damage repair, stop work orders, and require other compensation provided to individuals in a reasonable timeframe.

10. Traffic

- a. The impact of construction and operation traffic on exiting Slade St into Brook Street has not been addressed.
- b. Garland Road and Slade St are the only roads into the area of Naremburn and exiting Slade St can face extensive delays during peak hour due to the lack of traffic lights at this intersection.
- c. **As a formal condition of approval:** a traffic study is required to address the impacts of traffic during the construction and operational phases on Garland Road and Slade St. The study needs to address potential growth from future residential development in the number of residents within this area of Naremburn and consider installation of traffic lights at Slade and Brook Street.

Yours sincerely,

Naremburn  
NSW 2065

Declaration of any reportable political donations made in the previous 2 years **I have not made any reportable political donations in the past ten years.**