

28 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 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&Cs 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. Contaminants such as heavy metals and PFAS have been detected in Middle Harbour. These contaminants are dangerous to human health and many of them have been found above 'safe levels' (Table 1, Annexure C, Appendix F). Very limited sampling was conducted and further testing was not continued when levels of contaminants were found that are harmful to human health. Contaminants have been found in groundwater and surface water around the tip site in Flat Rock Gully and there is a risk identified that these may move down the gully as work proceeds.  
Large amounts of wastewater will be produced from both construction and operational activities. Wastewater will be treated and flushed down creeks. For example, 117,000 L per day will be released down Flat Rock Creek via Tunks Park and 296, 000 L down Willoughby Creek from the Cammeray Site via Primrose Park. Specific methods regarding how the water will be treated given the contaminants detected and listed as likely ie: asbestos is not clear.
3. I object to the project due to the scale, extent and risk of groundworks in sensitive residential areas and foreshore environments for example,
  - Over 3 million tonnes of ground-based spoil will be removed as part of the Beaches Link Project, trucked through our area and dumped at an unknown location.
  - 153, 000 cubic meters of sediment from Middle Harbour will be dumped at sea
  - 10,000 cubic meters of contaminated sediment will be barged out under the Spit Bridge, past beaches and dried out at an unknown location
  - 900 additional vehicle movements per day will service the Flat Rock Drive site and 590 at

## Cammeray

- 500m<sup>3</sup> of spoil is permitted under the EIS to be stored outside of sheds at Flat Rock and 4500m<sup>3</sup> at Cammeray - this presents a significant dust risk to the area

I request that with regards to spoil removal:

- Contaminated spoil is not stored onsite in Flat Rock Gully or Cammeray. The spoil should be immediately sealed and carried away from residential areas or stored underground
- The site should be remediated better than before, to compensate for pain and suffering during the 5 years of construction and restore ecosystems. This was done at Barangaroo. No contaminated soil is to remain onsite and the site should be rehabilitated back to bushland in Flat Rock Gully with improved walking tracks and bicycle paths and ecosystems restored
- Silica dust created by tunnelling sandstone must be more adequately dealt with than just a water cart and covering the load.
- Real time monitoring and alerts around air quality must be used at The Baseball Diamond and Netball courts at Flat Rock Gully as they do in the Hunter Valley near mine sites for recreational users of adjoining ovals, recreation fields, towns etc

4. 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

- Particulate Matter is already higher than what is recommended or considered "safe" - PM<sub>2.5</sub> and PM<sub>10</sub> levels are already above the guidelines for both the 24-hour and the annual average (including the 2025 goal set by NEPC (2016)). Modelling shows that pollution is redistributed as a result of the project. Some key corridors receive less pollution ie: Military Rd but sensitive receivers such as schools and sports fields receive more. Children are particularly susceptible to the health impacts of pollution and so this redistribution is unacceptable. The Western Harbour and Beaches Link program of works cuts through the largest school corridor in Sydney with 500-1000 pupils at approximately 26 schools. The precautionary principle must be applied to ensure the health of children across the project footprint. As a teacher at Cammeray Public School, with a child at the same school, I highly object to these unacceptable levels of pollution. The government has a duty of care to do what it can to reduce these levels now that it has monitored and confirmed the issue.

Additionally, the main temporary dive site in the area is earmarked for Flat Rock Reserve which is confirmed as being part of the old tip site at the top of Flat Rock Gully. Currently there is inadequate information in relation to health impacts (secondary to landfill gas and odours) of proposed tunnelling works at Flat Rock Drive. A Phase 2 assessment is needed to check for contaminants and quantify risk. Approval should not proceed until the risks are known and mitigation possibilities scoped. Testing around the freeway and at Cammeray site has also confirmed contamination. Serious consideration of the cost/benefits of the project in light of the risk to residents and children as well as the cost to mitigate and remediate sites should be given.

5. I object to the project due to the threat to our biodiversity and green spaces. For example,

- The Beaches Link will negatively impact significant wildlife corridors, including Flat Rock Drive and Manly Dam bushland, and marine ecosystems at Middle Harbour and the Spit.
- 23 threatened species will be negatively impacted. Hundreds of other species will also lose their habitat, be cut off from bushland, or be driven away - birds, frogs, reptiles, mammals and aquatic animals.

- Potential contamination of creeks and the harbour threatens land and marine ecosystems.
- Mitigation measures are inadequate - most animals cannot be moved, and biodiversity offsetting will not stop local wildlife extinctions.

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 Ch. 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.

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 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).

6. I object to the project as it is a tolled road and there is little evidence that it will alleviate current congestion. Many toll roads constructed in recent years, have not reached projected traffic volumes as drivers object to or cannot afford the tolls and so look for more local streets to rat-run through without cost.
7. 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. When the world is looking for ways to reduce emissions, the NSW Government is forging ahead with this short-sighted project which will increase them.
8. 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.
9. 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 high risk with little 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,

Kate

Declaration of any reportable political donations made in the previous 2 years e.g. I have not made any reportable political donations in the past two years.	
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