Submission on the Environmental Impact Statement
for the Beaches Link and Gore Hill Freeway Connection
Project Application Number: SSI-8862

Flat Rock Gully

Objection:

I object to the main dive site being located in Flat Rock Gully, and the negative impact this is going to have on the wildlife in the area, the trees and vegetation, the disturbance of contaminated soil and the impact on traffic flows on Flat Rock Drive.

Flat Rock Gully is a natural gully and an area of great importance as bushland which contains a very large variety of wildlife in the corridor which leads to Middle Harbour at Tunks Park. Although the area was once a waste dump, it has now been regenerated over many years, thanks to the Willoughby City Council and volunteers. It is now a very important freshwater corridor, as well as an important area of urban bushland. This bushland helps to maintain the biodiversity of wildlife in Sydney.

The area is protected under State and Commonwealth Legislation (Vol 1, 1.5.2) and has been zoned as E2 Environmental Conservation. Flat Rock Gully has also been classified as a Wildlife Protection Area because of its significant habitats.

Impact on wildlife in the area

The EIS actually acknowledges, on page 19-64, that the wildlife in the construction area, as well as the bushland neighbouring the construction site, will be driven away by the increased traffic on the site, the noise, the lights and vibration from the tunnelling. In some cases this could be permanent. This will mean that there will be a loss of habitat, food and breeding areas for many wildlife of Flat Rock Gully.

Threatened animals have been identified in the Flat Rock Gully including the Powerful Owl, the Large Bent-winged Bat and the Little Bent-winged Bat – see page 19-27

Furthermore, the natural reaches of Flat Rock Creek have been identified as “Type 1 highly sensitive key fish habitat and sensitive receiving environments.” – see page 19-41

The number of Swamp Wallabies in the area has been increasing and their habitat will be seriously impacted by the construction work.

Impact on Trees

It has been estimated that about 6 acres of land are going to be cleared to make way for the construction site in Flat Rock Gully.

This will result in at least 324 trees being impacted – 216 from “Direct Impact” and 108 from “Potential Impact – see Appendix W Table 3-2.

However, as the EIS states, some areas were inaccessible during the assessment, so it is highly likely that many more trees will be removed once the construction begins.

Contamination in the Proposed Construction Site

It is well known that the area to the east and west of Flat Rock Drive was used as a waste dumping ground for many years. The specific historical details of what was dumped here are not completely known, but the presence of the Walter Burley Griffin designed Incinerator testifies to the prior use of the land.

Yet the EIS does not appear to have completed its assessment of the contaminated soil. The following quotation comes from page 6-50:

> Potentially contaminated materials disturbed during site establishment and access decline construction would be subject to further investigation, remediation and/or management.

Similarly, other risks have not been properly assessed:

> For tunnelling works proposed at Flat Rock Reserve, there is a risk of encountering odorous waste material and landfill gases from historical waste landfilling activities in the locality. Detailed investigations have not been carried out to confirm the presence and extent of potentially odorous materials and landfill gases within the project site at this location … Further landfill gas investigations should be carried out within these areas to assess the potential presence or absence of gas which could potentially impact upon construction and/or operation of the project if not managed appropriately – see page 13-8.

Furthermore, the construction of the tunnel is going to create further contamination. Table 17-4 states that

> The waterways at most risk of being impacted by earthworks would be: Willoughby Creek and Flat Rock Creek.
> Stockpiles within 500 metres of a waterway that could potentially present a risk to water quality would be located at: Flat Rock Drive (BL2) and Punch Street (BL3) construction support sites (Flat Rock Creek).

“Temporary construction wastewater treatment plants would be designed to treat wastewater generated from tunnel construction activities and groundwater inflow during construction “ yet no detail as to how this treatment will occur is given.

Impact on Traffic

Flat Rock Drive is a very busy road , especially in the morning and evening peak hours, as well as on Saturday mornings when the Shore Playing Fields are used for Saturday morning sporting events.

It is proposed that a set of traffic lights will be installed to allow construction traffic to enter and exit the construction site.

Table 6-39 shows that there will be 310 vehicle movements during the four hours of the morning peak hour which equates to 77-78 vehicle movements per hour. During the evening peak hours, there will be 282 vehicle movements or about 70 vehicle movements

per hour. There will also be similar vehicle movements on Saturdays from 8 am to 1 pm, which represents the time that most of the sports are held on the Shore Playing Fields.

The addition of these large B-double trucks entering and exiting from Flat Rock Drive is going to impact significantly on the normal traffic flows. These large trucks and the consequent congestion will force cars to use other roads such as Eastern Valley Way and Willoughby Road.

The use of the word 'temporary' in the EIS is misleading. Table 6-12 shows that the construction time is anticipated to take five full years, but it is highly likely to take much longer than this, if other tunnel construction projects are an indication of reality. The Northconnex finally opened in October last year, but only after almost a year of delays. (Source: SMH October 30, 2020)

Solutions:

The EIS has shown itself to be woefully inadequate in many ways, leaving further testing and analysis to be done after construction of the tunnel commences. In fact at a recent information evening at the Northbridge Progress Association, one of the participants admitted that the EIS is really only 25% complete. The rest is up to the contractor. This is very poor. The contractor should not have the control over how to deal with all of the incomplete issues.

I would like to request that all testing mentioned in the EIS be done now, not further down the track as the EIS states will happen in many situations, and that the results be fully released. The EIS should be a comprehensive document, not half finished. For example, the method of wastewater treatment needs clarification. The revised and complete and detailed EIS should then be re-exhibited so that the community can provide feedback on **all** proposals and not be left in the dark as to what might happen once a contractor is appointed.

I also request that contaminated spoil not be stored onsite in Flat Rock Gully. All contaminated spoil should be sealed immediately and taken away from residential areas or stored underground.

Willoughby City Council has a tree policy which requires that three trees be replaced for every tree removed – see Willoughby city Council Vegetation Management Strategy 2020. I therefore request that this Tree Policy be followed in any remediation programs on the construction site.

Finally, wildlife experts should be consulted to develop a comprehensive list of measures which need to be taken to protect the wildlife in Flat Rock Gully from noise, light and traffic and to ensure that the threatened and vulnerable species are fully protected.

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