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## **Submission to the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement**

The following submission is made on behalf of the members of Willoughby South Progress Association. It is within our Association's boundaries that the Flat Rock Gully access decline is located.

**In summary the Association objects to findings of the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement (December 2020) for the following reasons:**

- 1. Business Case:** No business case has been released, separate from the Western Harbour Tunnel project. Without a separate business case, the scope of the Northern Beaches Link Tunnel (NBLT) is such that the community is not able to assess the financial advantage of this separate major project.
- 2. Traffic Density:** No account appears to have been taken of the effect of the Covid pandemic on future traffic density. It is commonly understood that many businesses will continue to operate, at least partially on a "working from home" basis leading to a permanent reduction in peak traffic loading on each of the Peninsula traffic feeder roads. This brings into question the need for the NBLT. We recommend that the timing of the build program be put back a minimum of two years in order to assess the actual effect of the Covid pandemic and thus whether the business case will support the cost of this infrastructure. The business case will likely be set further back by the introduction of the planned express B-line bus service from Dee Why to Chatswood in conjunction with the completion of the Sydney Metro South.
- 3. Environmental Considerations:** The location of the tunnel construction decline at the top of Flat Rock Gully (FRG) threatens a 25 year effort by Willoughby Council (WCC) to create a bushland reserve on what was, for many years, a council land fill site. This bushland section provides habitat for a wide range of native animals, invertebrates and birds and has been classified by WCC as an Environmental Conservation Zone exactly so that disturbance as

threatened by the tunnel construction, cannot occur. This section of FRG also is an important link in the wildlife corridor between the Lane Cove River and Middle Harbour. These corridors are vital in maintaining native animal populations which are in the process of decline across Sydney. We can't afford to lose this part of the corridor.

Further, polluted water flows originating from the disturbed ground of the remediated land fill tip that was once in FRG, both due to leachate and flood water flows, is not dealt with in sufficient detail in the EIS. This threat which affects both the Tunks Park playing fields, and even more seriously, the waters of Middle Harbour, poses a major environmental threat of the FRG decline works. Whether due to climate change or not, we have experienced two one-in-a-hundred-year rainstorms in the past three years and video evidence of the effect on Flat Rock creek is compelling and leads us to the conclusion that far more detail; needs to be provided in the EIS as to how these events will not lead to serious downstream pollution.

**4. End of Construction:** The EIS is non-committal regarding subsequent use of the decline site following completion of the project. The environmental importance of the FRG bushland cannot be overstated therefore it is essential that the FRG dive site be returned to bushland and not be used to expand sporting facilities as has been suggested by interested parties. The general community, who would benefit from the return to bushland with its walking paths and space for quiet enjoyment, is far greater in number than those represented by the various sporting bodies using the Willoughby Bicentennial facilities. This is the more so in view of the major residential developments occurring on the nearby Channel 9 site, along Willoughby Rd and in Walter St.