Objections to the Beaches Link Gore Hill Freeway Connection
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I object to the BL until such time as

- The business case is released for public consideration
- That all public transport alternatives to the BL be demonstrated through a transparent process that includes public engagement and consultation. The EIS documents have not comprehensively explored or evaluated the relative merits if public transport alternatives. This needs to be done
- Data in the BL EIS be updated to include the impact of the B Line buses on traffic congestion. It is noted that data for traffic predictions is over 4 years old. New data needs to be collected to ascertain the need for the project given the success of the B Line buses and now post Covid conditions where many people are working from home full time or in part.
- A Phase 2 contamination study and all testing results to be released to the public (widespread contamination is identified but underassessed)
- Tunnel design changed to incorporate a dedicated public transport corridor
- The entire project is certified carbon neutral during construction and operation

I object that the temporary primary dive site is in Flat Rock Gully for these reasons:

Loss of bushland and biodiversity

- 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.
- Permanent loss of bushland in Flat Rock Gully - The EIS is inconclusive on the future of the destroyed site which is 5% of the Flat Rock Reserve. Decision-making about its future should not be left to the end of the construction process and the authority to determine whether a portion of bushland reserve is permanently lost should not be delegated to local council's current constituents. Given permanent loss of bushland is of state rather than local significance, it should be considered on its merits alone and not form part of an infrastructure project that does not require permanent loss of bushland. The EIS should confirm its rehabilitation and return to bushland
- The Flat Rock Gully dive site design is amended to avoid the need to remove any old growth remnant bushland
- 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
- The Flat Rock Gully dive site design is assessed and amended as necessary so that the wildlife corridor is assured during and upon project completion
- A full assessment of biodiversity (not limited to threatened species) in and around Flat Rock Gully, Middle Harbour and nearby bushland is carried out & findings shared with the community. Flat Rock Gully is a key part of the network of wildlife corridors across Sydney required to maintain biodiversity.

- A full suite of mitigation measures to protect all the wildlife in local bushland from adverse impacts such as noise, light, traffic, changes in quality and extent of surface & ground water in Flat Rock Gully during construction & remediation of Flat Rock Gully upon project completion
- The Beaches Link project delivers and enacts a long term ecological vision & management plan to restore Flat Rock Gully, Tunks Park and Middle Harbour to its natural condition and better than it was prior to the project – including undertake full bush regeneration and three for one tree planting as required by the local vegetation strategy rather than apply biodiversity offsets to areas far distant, instead apply them to the work of weeding and regenerating and installing nest boxes in Flat Rock Gully and Tunks Park beyond the construction footprint

Increased noise during construction and operation at FRG

- A permanent acoustic barrier along the full length of Flat Rock Drive and around the full extent of the excavation site and some other form of acoustic treatment to homes facing the Dive Site and Flat Rock drive (e.g. reimburse any costs associated with the installation of double glazed windows and doors facing Flat Rock Drive)
- A permanent acoustic wall along Flat Rock Gully will mitigate the noise to nearby residents from predicted 560 truck movements per day and the additional support vehicles required to come into the site. I also understand that concrete trucks will be delivering to the site in night hours during the construction period. I am particularly concerned as trucks use air brakes coming down the long flat rock drive hill to the excavation site and for fully laden trucks accelerating up away from the dive site. This wall would have to be high enough to ensure bird species such as the Powerful Owl do not fly into the trucks attending the site at Flat Rock This should be installed anyway as it is a major arterial road. During construction acoustic treatment to homes facing the Dive Site and Flat Rock drive (e.g. reimburse any costs associated with the installation of double glazed windows and doors facing the dive site).

Contamination

- A Phase 2 contamination study and all testing results to be released to the public (widespread contamination is identified but underassessed) for FRG
- Contaminated spoil not to be stored or retained onsite at Flat Rock Gully, Willoughby Leisure centre or Bicentennial oval as there are sensitive receivers and residences upwind from the site. At present there is a provision for spoil at FRG to be stored on site – up to 500m3. This is identified as a risk in the EIS during windy weather and when it is dry. It should not be stored but transported immediately from the site. This includes clean spoil as it too can become a dust risk
- Comprehensive remediation of all contamination of Flat Rock Gully including removal and / or treatment of historic landfill, chemical & other unknown disposals [p26 Ch16 EIS, p34 Ch16 EIS, p42 Ch16 EIS, p43 Ch16 EIS, p46 Appendix N EIS] is made a deliverable of the Beaches Link project
- A landfill gas study in compliance with Hazardous Ground Gas Guidelines for construction and operation of tunnel (p35 Ch16 EIS, p78 Ch16 EIS) is conducted prior to addressing removal of landfill contaminant at Flat Rock Gully, Willoughby Leisure Centre and Bicentennial oval;
- Detailed investigations are carried out to confirm the presence and extent of potentially odorous landfill waste material and landfill gases within the project site at Flat Rock Gully;
- Proper implementation of enduring lining & containment structures of contamination of the Willoughby Leisure Centre and Bicentennial oval sites are made a deliverable of the Beaches Link project (p43 Ch16 EIS, p53 Ch16 EIS,);
- Mitigation plans be devised and implemented should odorous materials and / or landfill gases be exposed during removal of Flat Rock Gully during construction;

- The community is transparently consulted around the number, type, positioning, ongoing operation & alert reporting from air, soil, surface water, ground water & harbour water monitoring stations within the project boundaries (p73 ch16 EIS);
- Real time/ Alert style air quality monitors installed at Bicentennial Reserve & Willoughby Leisure Centre netball courts to keep people participating in sports activities safe;
- Ensure all landfill exposed by tunnelling capped at end of tunnelling and reinstate crush sandstone as contoured base for re-establishment of locally indigenous vegetation and habitat. Remove all temporary structures (including noise mitigation sheds).

Drawdown and ground impacts and water

- I am concerned that groundwater drawdown (of up to four metres by 2028 and 11 metres by 2128) caused by the construction which is predicted to occur further downstream in FRG will, over time, and particularly in times of drought, lead to trees and bushland becoming highly stressed and/or dying.
- That the revised EIS map the potential areas impacted by drawdown and provide appropriate offsets including those based on a worst-case scenario as a precautionary principle in the conditions of consent. These should cover riparian areas and Threatened Ecological Communities.
- That the revised EIS include conditions of consent to provide appropriate funds for Willoughby City Council to continue to monitor groundwater drawdown in the long term – for a minimum of 50 years. The conditions should include a clear allocation of responsibilities.
- The Tunnel design is amended to reduce draw down at areas of environmental interest for contamination at Flat Rock Gully (Project only 2028 up to 21M p58 Ch16 EIS, Project only 2128 Willoughby Leisure Centre up to 27M p66);
- 117,000 kL from the tunneling will be flushed down Flat Rock Creek each day during construction. It is not clear if the water will be adequately treated for the full range of chemicals detected in the area. Hence wastewater to be treated via a method other, or in addition to, sedimentation only to ensure that the full range of dangerous chemicals identified are properly removed.
- The proposed dive site is within the Creek area where flooding occurs. There appears to be little assessment of flooding impact on the Flat Rock dive site and downstream habitats, parks and waterways. The flood study limits the Flat Rock Creek assessment to the upper reaches around Gore Freeway. Given the size of the catchment, the location of the dive site in and around the diverted creek and in a flood zone it would be appropriate to continue the flood study around Flat Rock Gully and down into Tunks. This information should inform the heath risk and waterways assessment
- Properties above and in proximity to the tunnel route offered a free pre-construction property condition survey providing a clear record of a property's condition before work starts. Any damage sustained (including "slight" movement of 10-50mm p29 ch16) during construction (tunnelling, vibration, accidents, ground water movement) or operation (due to draw down) of the Beaches link project will be promptly addressed to the satisfaction and at no cost to the property owner
- Engage consultants (independent of contractors) to measure water quality in the creek before, during and after construction to check for scouring, contamination from the site and elevated salinity and sediment levels. Make this information publicly available

Dust

- 500m3 of stockpiled spoil is permitted outside the shed according to the EIS. Given that contaminants have been identified and the EIS states that dust is "difficult to contain" even with the best mitigation measures in place this is a considerable risk particularly to children's sport that is played adjacent to the Flat Rock site

- Silica dust created by tunnelling sandstone more adequately dealt with than the mitigation outlined in the EIS.
- Real time monitoring and alerts around air quality 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
- Air conditioning offered to residences on the rim of Flat Rock Gully so that there is no need to open windows

Traffic

- The Brook St/Flat Rock Drive Corridor is a key corridor for children accessing local schools. An active transport overpass or underpass should be put in place to ensure safe passage.
- Marshalling areas will be needed for trucks across all sites but particularly at the Flat Rock site. Marshalling should not be permitted on local streets and particularly not in the Naremburn Conservation Area due to the increased vibration risk. Trucks should not be allowed to idle while marshalling and every load should be tested and inspected to ensure contaminants are fully contained.
- Trucks accelerating up a steep hill from zero is likely to create a substantial amount of diesel pollution - the health impacts of this have not been fully assessed
- The noise assessment claimed that the trucks on Flat Rock Drive would not create more noise however the assessment does not appear to account for braking on a very steep hill - the noise assessment should be redone
- A re-assessment of surface level traffic with all major local roads included in the operational modelling ie) Eastern Valley Way, the full span of Military Rd and Willoughby Rd was not included

I support the submission made by the Willoughby Environmental Protection Association (WEPA) in response to the Beaches Link and Gore Hilly Freeway Connection EIS.