

**Community Representatives of the Bicentennial Reserve and Flat Rock Gully Advisory  
Committee and Bay Precinct Committee  
Beaches Link and Gore Hill Freeway Submission  
EIS SSI\_8862**

1. **Who Are we:** We are the community representatives of council committees which border the Long Bay catchment. The committee was first formed in 1983 to assist council in developing their Bicentennial plans and is responsible for advising council with regard to Plans of Management for the area. This submission represents the individual views of the non-council members. Bay Precinct is a North Sydney Precinct that borders the catchment on the southern side of Tunks Park and similarly is tasked with advising North Sydney Council – they are also included in this submission.
2. **Aim of the committee**
  1. To provide guidance on the current Plan of Management for Bicentennial Reserve & Flat Rock Gully as it relates to ongoing implementation, development work and management of these areas.
  2. To advise on aspects of the use, control and management of Bicentennial Reserve & Flat Rock Gully for consideration by Council.
3. **Scope:** The Bicentennial Reserve and Flat Rock Gully Committee (BRFRG) is tasked with advising the council with regard to Hallstrom Park, Bicentennial Reserve, Willoughby Leisure Centre, Flat Rock Reserve, Flat Rock Creek and Flat Rock Gully Bushland Area. Bay Precinct is tasked with advising the council with regard to Tunks Park and surrounds.

Due to the extent and uncertainty represented by the impacts listed the below non-council representative members of the Bicentennial and Flat Rock Gully Committee and Bay Precinct together **object** to the Beaches Link Tunnel and Gore Hill Link until such time as a reassessment is possible via a re-issued EIS. Willoughby Council will be submitting a separate submission and this content has been forwarded to them to inform their response. A re-issued EIS should include the following for public consultation:

1. **A phase 2 Contamination Study.** It is evident that insufficient testing has been completed to assess the risk of the project and make a Determination - particularly regarding the placement of a dive site in the Long Bay Catchment (in or around the legacy landfill site) and the risks associated with an Immersed Tube crossing of Middle Harbour. The Bicentennial Reserve Committee asks that a Phase 2 Contamination Study be completed, and the results published for further consultation with the community before any approval is given. We ask for current testing results to be released as, in contrast to Middle Harbour, no numerical data indicating the degree of any contamination has been released for Bicentennial Reserve or Flat Rock Gully.
2. **the need for the project**, and its superiority over public transport alternatives, has been demonstrated by way of a transparent process involving informed public engagement and consultation, noting that the EIS process has to date failed to properly evaluate the relative merits of such public transport alternatives.
3. **the Business Case** which details the cost/ benefits is released for public consideration.
4. The **EIS is re-released** for public consultation addressing the following areas of identified or under assessed risk:
  1. That the use, **social importance**, contribution to community health, heritage, biodiversity and significance of the Long Bay Catchment composing of Bicentennial Reserve, the Baseball Diamond, Flat Rock Reserve, Flat Rock Gully and Tunks Park (within North Sydney Council boundaries) has not been sufficiently recognised in the EIS. Local groups, including the Bicentennial and Flat Rock Gully committee, have not been consulted as part of the design development or during the consultation process **Action: re-scope the area in consultation with this committee and other relevant groups who understand the history, importance and use of the area. See the attached background document for more information**
  2. **Groundwater** under Bicentennial Reserve has been confirmed as contaminated and the EIS states that it may move through and around the site if the landfill downstream is disturbed **Action: fully test groundwater, publish the results to the public and provide for containment of contaminated groundwater**

3. It is recognised that the dive site sits in a **flood zone** and the flood study does not extend to Flat Rock Reserve or downstream environments where there is old growth forest and extensive playing fields. **Action: Extend the Flood Study including all downstream environments and the risk of contaminate migration during flood**
4. **Soil and gas testing** has not been completed in and around the site to establish the level of risk **Action: Complete gas studies at Bicentennial and Flat Rock Reserve and publish results**
5. The EIS states that there will be **high level noise impacts** at various stages of the project and that *"Five recreational receivers in NCAs 31.1 (Dawson Playground), 36.1 (Bicentennial reserve including Willoughby basketball and netball courts and the Flat Rock Baseball Diamond) and 38.2 (Shore playing fields) are predicted to experience noise levels above the noise management levels during the majority of the construction activities"* The period of construction is 5 years - this is unacceptable due to the thousands of children playing sport in the area and will also have a significant impact on biodiversity, esp. nocturnal species. **Action: Reconsider the placement of the dive site in the valley due to the noise implications close to sports fields, homes and habitats.**
6. The EIS states that there will be up to **900 additional vehicle movements** required on Flat Rock Drive. This presents a significant diesel risk to users of the area particularly due to the steep gradients. *"The use of on-site diesel-powered vehicles, generators and construction equipment, and the handling and/or on-site storage of fuel and other chemicals, would result localised increased concentrations of airborne particulate matter, CO, NOX, sulfur dioxide and volatile organic compounds."* **Further Action: Reconsider if placing the dive site anywhere in a steep gully and around landfill is too high a risk to children and communities. Mitigation: install an alert style real time air quality monitor that sporting groups and parents can subscribe to get real time alerts. Provide electric charging onsite, fit vehicles with pollution dampening devices.**
7. **Construction dust risks** have been identified in the EIS as a risk for both the bushland and sports fields and the EIS states that it is "difficult to contain". The risk that this dust has the potential to be contaminated, is of high concern to the community. The health consequences of inhaling pollution while doing exercise is well documented whether contaminated or not. Children are particularly vulnerable to pollution impacts. Australia's largest Netball Club plays in close proximity and the Baseball Diamond and Shore Oval may also be impacted. **Mitigation: Provide an alert style air quality monitor in Bicentennial Reserve/ Baseball Diamond mandate that no spoil is permitted to be housed outside of sheds (currently the EIS allows 500m3), mandate strong dust control methodologies for construction and transport, remove all contaminated spoil immediately from site.**
8. There are foreseeable **traffic issues**. The 900 construction vehicle movements per day on Flat Rock Drive and an additional set of lights at the bottom of the hill has the potential to push traffic onto local streets and cause widespread delays in and around sporting and recreational facilities. The conflict between construction vehicles and children getting to and from sport also needs to be considered. **Action: re-assess the local traffic implications particularly during Saturday Morning Sport. Mitigation: implement safety marshals for all intersections before, after school and on Saturday mornings. Consider designs that require less spoil haulage through local areas, re-consider the placement of the dive site in a deep valley surrounded by sporting fields.**
9. The **drawdown impacts** are stated as: *"Northbridge as a result of the project will be 28m, in Flat Rock reserve 21m and at Willoughby Leisure Centre 22m"* resulting in water stress for vegetation and settlement issues. Draw down in the area will have a significant impact on the ability of our grounds to retain moisture and the viability of bushland in an area that supports endangered species. The area is already flood prone and settlement may exacerbate the issues around this as well as contamination. **Mitigation: mandate that the tunnels be fully lined to minimise drawdown**
10. **The Operational Air quality** modelling results confirm that our two representative community receptor points (CR25 and CR 26) are modelled to experience increased pollution as a result of the project with the highest increase across the project of 24hr PM2.5 at the modelled location closest to Bicentennial Reserve, as well as slight increases in NO2 (1 hr mean) and PM10 (24hr Mean). Given that the sports fields are housed

in a valley (Bicentennial, Baseball Diamond and Tunks Park) there is concern that inversion events will trap these pollutants in and around sports fields, walking tracks, active transport links and bushland. We note also that the local background air quality monitoring results were not used to establish background levels which are suspected to be higher in and around the Warringah Freeway and Gore Hill corridor than elsewhere. The overall project (Beaches Link and Western Harbour Tunnel) contributes to a 8.4% increase in CO, 6.5% increase in NOx, 7.1% increase in PM10 and a 7.1% increase in PM2.5 (Table 8-10 Appendix: Air Quality). The Federal regulatory review with regard to fuel efficiencies has been deferred so the project should be assessed on it's own contribution to pollution not the assumption that fuel standards will substantially improve the situation. The EIS also demonstrates that it will create a significant increase in vehicle kilometres travelled as compared to a do nothing future scenario. Our area is already at grid lock and parking is scarce – adding more vehicles to the roads, local transport hubs and creating more pollution is not reasonable **Action: Reassess the impact of air pollution on children's sport, active transport and users of the area. Provide a alert style air quality monitor indefinitely.**

11. The **biodiversity** of the area is under threat due to the clearing of 390 trees, contaminated groundwater migration, spoil and gas contaminants, wastewater flushing down the creek (1M+ of wastewater per day), flooding, significant drawdown (putting vegetation at risk), noise and run off from a disturbed tip site. **Action: reassess the biodiversity impacts in light of contamination results and the impact to the valley as a whole given it is one catchment, a wildlife corridor, a flood zone, subject to drawdown, the extensive impacts on the creek and other risks presented. Return trees to the area rather allowing them to be offset. Build a tall sound wall around the site to lessen noise impacts and protect birds such as the Powerful Owl from collision with trucks.**
12. **Active transport links** will be diverted and present a risk to health and safety. The active transport link around the dive site will add to trip times and be located in conflict with trucks, dust, noise, contaminated spoil removal etc This route presents a risk to health and safety. **Mitigation: implement an active transport overpass or alternative route separated from the construction site in consultation with Willoughby Council and the Bicentennial Reserve and Flat Rock Gully Committee.**
13. The potential for conflict with the **Northside Storage Tunnel** in the area has not been assessed. This may cause project delays, unexpected costs and present a risk to community and workers - given that it has a capacity to hold 500, 000 Million Litres of sewage and stormwater. **Action: Risk assess the conflict between the tunnels and the impact of vibration, drawdown and the health impacts associated with a spill.**
14. Cumulative Impacts associated with the development of the Willoughby Leisure Centre have not been considered **Action: consider and document impacts in conjunction with Willoughby Council and Bicentennial Reserve and Flat Rock Advisory Committee and Bay Precinct.**
15. The *Protection of the Environment Administration Act 1991* (NSW) requires the "improved valuation and pricing of environmental resources". The project as it stands does not achieve this requirement. **Action: redesign of the project to better protect the resources impacted by it and the provisioning of a remediation fund to account for any accidents that may occur, damage to sports fields and remediate the area: sports fields, ground contamination, water, bush etc to a level that is objectively assessed as superior to what is available to the community today. A benchmarking report should be completed prior to and after completion by an independent consultant to establish whether improvement across all categories has been sufficiently achieved.**

## Committee Members

Larissa Penn – BRFRG member representing Naremburn Progress Association (Willoughby Council Area)  
 Kristina Dodds - BRFRG member representing Northbridge Progress Association (Willoughby Council Area)  
 Karen Borg - BRFRG member representing Willoughby South Progress Association (Willoughby Council Area)  
 Heidi Key -BRFRGmember representing bushcare, the Drive and Flat Rock Gully Bushcare Group (Willoughby Council Area)  
 Ineke Walker - BRFRG member representing Northern Suburbs Netball Association (Willoughby Council Area)

with

Brian Emanuel - Bay Precinct President (North Sydney Council Area)