

Submission  
No 457

## INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

**Organisation:** Flat Rock Gully Residents Action Group

**Date Received:** 18 June 2021

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Calbina Rd  
Northbridge NSW 2063

18 June 2021

The Hon. Daniel Mookhey MLC  
Chair  
Public Works Committee  
NSW Legislative Council  
Parliament House  
Macquarie Street  
Sydney NSW 2000

[Public.Works@parliament.nsw.gov.au](mailto:Public.Works@parliament.nsw.gov.au)

Re Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link

Dear Members of the Public Works Committee,

This Submission is written on behalf of the Flat Rock Gully Resident Action Group (FRGRAG).

The FRGRAG would like to thank the committee for this opportunity to raise our concerns regarding the impacts of the construction of the Western Harbour Tunnel and Beaches Link on Flat Rock Gully, the foreshores and connecting waterways.

The FRGRAG was formed during the consultation period in 2018 where the community was asked as to which side of Flat Rock Gully should be the location for the primary tunnelling dive site for the Beaches Link. Two options were given, Site A - the Baseball Diamond on the western side of Flat Rock Drive, or Site B the regenerated bushland east of Flat Rock Drive.

The residents who form part of the FRGRAG group live in the streets on the rim of Flat Rock Gully in Northbridge and include Calbina Road, Strathallan and Cliff Avenues, Pyalla, Nulgurra, Baroona and Baringa Roads.

This submission contains the following documents: Submission to Upper House Inquiry  
: Map of Flat Rock Dive Site  
: Document detailing the risks of  
silica dust exposure  
: Previous FRGRAG submission  
made in March 2021 to the Beaches Link EIS.

Regards

On behalf of the Flat Rock Drive Residents Action Group

## **Submission by the Flat Rock Gully Residents Action Group to the Upper House Inquiry Into the Impact of the Western harbour Tunnel and Beaches Link.**

We would like it noted that we strongly object to the Western Harbour Tunnel (including the Warringah Freeway Upgrade) and Beaches Link (including the Gore Hill extension) projects and urge the Inquiry to recommend that the NSW Government reconsider additional road tollways that impact on our built and natural environments, contribute to climate change, risk the health and wellbeing of vulnerable members of our community due to increased pollution levels, silica dust and health risks associated with the release of toxic contaminants.

We have addressed each of the Terms of Reference as part of this Parliamentary Inquiry.

### **(a) The adequacy of the consideration of alternative options**

- What were highlighted in the Beaches Link EIS were the different alternate routes for a road tunnel and why the current route was chosen. Public transport was briefly mentioned. The EIS did state that a rail or metro service would be too expensive for the current population on the Northern Beaches to support.
- There was no business case and cost-benefit ratio for rail, tram, light rail, or bus options given in the BL EIS.
- There was no reference on the success of the current B-Line bus service, nor was this assessed.
- There was no reference to the option of public transport over the Roseville bridge which is more congested than the Spit bridge (diagrams in the Beaches Link EIS)

### **(b) The cost of the project, including the reasons for overruns**

- A Stage 2 contamination study has not been completed for the Flat Rock Drive site, despite it disturbing an historical tip. Disturbing contaminated material in a water catchment zone and residential area would require remediation, the cost of which has not been calculated. This could cause significant overruns as was the case with the West Gate project in Victoria which created cost blowouts. There is also the real possibility of landfill gases at this site as detailed investigations and testing has not been carried out. The depth of tip material at the site in some places exceeds 70m.
- Misleading statements were made about 'worse case scenarios' but a 'worst case scenario' was not applied to contamination at FRG, or contamination at the site of the immersed tubes across Middle Harbour where they will dredge the harbour.
- The cost per kilometre of the Beaches Link Tunnel is the most expensive of any road tunnel in NSW, due to the complex engineering involved. It also costs significantly more than a rail tunnel, despite a lower capacity to move people. Overruns due to unforeseen topography are probable. There has been inadequate studies of the Luna Park Fault line that runs along the Northbridge Peninsula which the tunnel will travel through at a depth of up to 120m

**(c) The consideration of the governance and structure of the project including the use of a 'development partner' model**

- The BL is not a tunnel that takes vehicles through or around parts of Sydney. It is a tunnel to a dead end and does not reach the Northern Beaches. The question is would there be enough traffic for the project to be funded by tolls, if not it could result in a multi-billion dollar subsidy from the NSW government and taxpayers.

**(d) The extent to which the project is meeting the original goals of the project**

- The stated objectives to the projects are vague statements about reducing congestion and making faster journeys. There are no tangible, measurable goals or outcomes mentioned.

**(e) The consultation methods and effectiveness, both with affected communities and stakeholders**

- The BL and WHT were both released at Christmas. People were away, schools closed, many in our group caring for children. It was a bad time of year to read through thousands of pages of technical material and concentrate on making sense of the EIS with all its chapters and appendices. It was very difficult to find specific information quickly or easily. There was also further difficulties in consultation exacerbated by the Covid 19 pandemic as it restricted meetings, community gatherings, access to hard copy documents at the local library
- Zoom sessions were organised by Transport for NSW for community feedback on the Beaches Link EIS. We would recommend in future that all consultation is via zoom where everyone has the opportunity to ask questions and jointly listen to responses. However many questions remained unanswered. In one session a member of our group asked how the project was consistent with what we know about climate change and increasing the number of vehicles on the road. The response was that the project would not increase sea levels. This was unacceptable.
- Artist impressions in consultation documents were misleading. The update on the Flat Rock Drive site with the artist impression did not include the traffic lights at its lowest point and the gradients along Flat Rock Drive were understated.

**(f) The extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio**

- It appears that data collection for the Beaches Link EIS was compiled before Covid 19. Many more people are now working from home more often which would lead to lower traffic volumes, especially when public transport becomes fully utilised. The cost benefit needs to be re-calculated and made publicly available

**(h&i) Whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts and whether the project is subject to appropriate levels of accountability**

- Yes. No such model has been published yet. The project cost the EHT/EFU and the BL will cost approximately \$1billion per km.

**(j)The impact on the environment, including marine ecosystems**

Bushland clearing

- For the Beaches Link tunnel over 16 acres of urban bushland will be cleared.
- At the proposed Flat Rock Gully dive site over 300 mature trees in the 30-year-old regenerated bush will be cleared.
- Flat Rock Gully bushland is a wildlife habitat and feeding ground for the endangered Powerful Owl, as well as other native species of plants and animals, such as micro bats, wallabies and echidnas. Hundreds of local species will lose their habitat or will be driven away by noise, light and contamination.
- Flat Rock Gully forms a wildlife corridor stretching through to Lane Cove National Park. The dive site will cut the wildlife corridor and there is no commitment in the EIS for the cleared land to be returned to bushland. Council will have the option to either regenerate, keep the acoustic shed onsite or turn the once bushland into playing fields. Currently the bushland is a wildlife protection zone and permanently removing bushland for a non-permanent structure is unacceptable.
- Urban bushland is fast disappearing and what remain needs to be protected for generations to come. The use of biodiversity offsets to buy credits elsewhere merely drives species to extinction in urban bushland.

Contamination

- The proposed dive site at FRG sits on top of an historical tip site, in operation for over 80 years. Fill in some places reaches depths of up to 70m. Chemicals and other toxic waste are under capping and now covered by bushland. Waste was generated from the Hallstrom refrigeration factory and from Royal North Shore Hospital as well as household rubbish and construction materials including asbestos. It was unregulated. The EIS outlined a desktop review with minimal onsite testing - it is only a preliminary assessment of contamination. What is required, for the environment and human health, is a stage 2 contamination report and the EIS reissued for public consultation with this detailed contamination assessment.
- The failure to effectively manage contamination risks from a former tip site will impact on the immediate environment and marine environments downstream.
- FRG as the dive site needs to be reassessed and relocated due to contamination risks, loss of wildlife habitat, it is in a major water catchment area, is in close proximity to playing fields, residents and visitors utilising passive and active recreation areas.
- There is contamination across the WHT and BL route. Preliminary works commenced for the Warringah Freeway Upgrade in March 2021. The contractors have already breached Conditions of Consent in relation to contaminated sites and how they are managed. Transport for NSW is not a regulatory body and cannot enforce the conditions of consent once the contract has been awarded. The responsibility for following the conditions of consent transfers to the contractor and they self-regulate. This is of great concern for the community particularly with an at risk sites such as FRG.

#### Groundwater and drawdown

- is expected to be up to 22m under Flat Rock Creek potentially leading to the loss of water dependent plant ecosystems in the Gully
- 117,000 L per day of wastewater will be flushed down Flat Rock Creek each day from both construction and operational activities. It is uncertain as to how this water will be treated before entering FR creek and travelling down to Middle Harbour

#### Air quality

- Local air quality impacts due to dust generation - 1,000,000 of sandstone will be tunnelled and transported from the FRG dive site. This brings with it the dangers of construction dust and silica from freshly cut sandstone. Although mitigation is outlined, silica dust containment cannot be guaranteed during dry or windy weather.
- **Please refer to paper attached on Respirable Crystalline Silica Dust in tunnelling spoil written by a concerned local resident. Also attached is the map of the Flat Rock dive site in relation to sporting facilities**
- The impact on air quality compared with public transport alternatives, has not been considered. In Flat Rock Gully for instance there will be an additional 900 vehicle movements in and out of the dive site each day for 5 years. As the dive site is in a gully, pollution from increased traffic and trucks travelling uphill will remain in the gully and pollution levels - diesel fumes - increase. The installation of traffic lights will be installed slowing oncoming traffic that will increase congestion and add to pollution from exhaust emissions from idling traffic.
- The Western Harbour and Beaches Link tunnels will produce more emissions than the Southwest Metro (approx. same distance) before adding cars. Lighting, emergency systems, ventilation fans and the concrete itself (larger than metro/ rail tunnels) all contributes to a higher emissions profile

#### Climate change

- The broader impacts on climate change and greater car reliance over public transport alternatives have not been considered

#### Marine ecosystems

- The health Middle Harbour and marine ecosystems is threatened by the destruction of foreshore and water catchment areas, and the potential for existing contamination to be redispersed.

#### **(k) The adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally**

- Noise that will be generated from the dive site, particularly during the construction phase is expected to take 9 months impacting residents in our streets. Noise levels range from 75db to 60db during extended periods and could impact for up to 5 years. This is unacceptable to human health with possible long term hearing implications for residents.
- The gully is deeply sided which naturally amplifies noise in its vicinity.
- Given the nature of the construction activities, the mitigation measures may not be adequate, leading to significant negative impact on the health and wellbeing of local residents.
- A key concern at Flat Rock is the noise generated from truck air brakes as they slow down the long hill leading to the excavation site entry point at the bottom, and then the exhaust and engine noise from those fully loaded trucks accelerating up the hill from the site. As the dive site is in a valley the noise travels further and is louder.
- Ground-borne noise impacts during tunnelling

**(l) The impact of the project on nearby public sites**

- Flat Rock Gully is the nearby public site, and the dive site is in it. This public area will be lost to the community for at least 5 years with the bushland permanently lost.
- Aboriginal Heritage in Flat Rock Gully - The Cammeraygal people called Flat Rock Creek - “Mugga” meaning diamond python, which is the totem of the Cammeraygal. There was an aboriginal community living in Flat Rock Gully up until the 1890s. There are still remnants of cultural significance in FRG including cave paintings of a diamond python that have been dated at over 5000 years. The BL EIS has concluded there is potential for archaeological deposits in the area. (BL EIS Table 15-2). The placement of the dive site could disturb these areas of cultural significance.

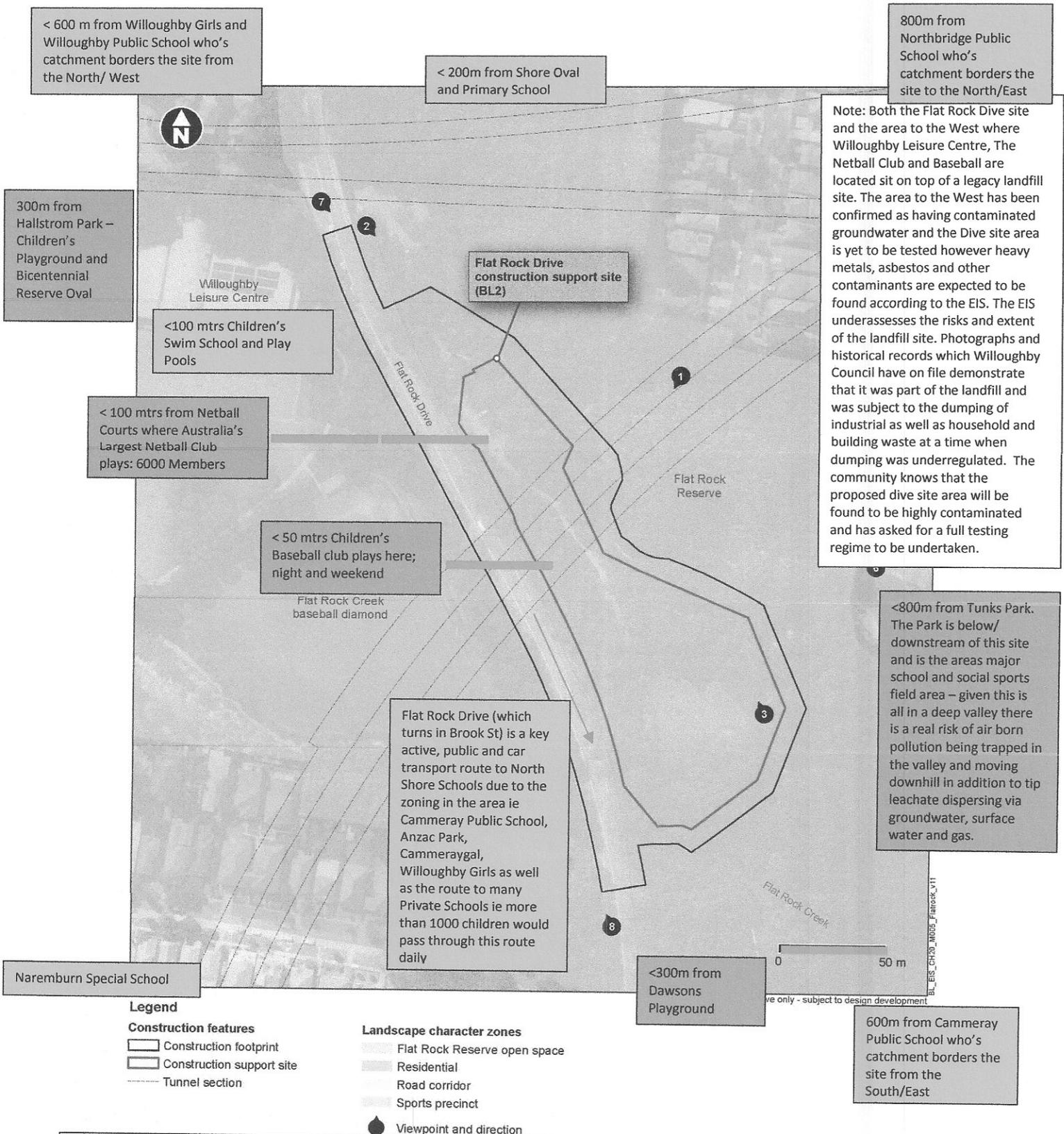
**(m) Any other related matter**

- There is a reliance on overseas contractors.
- The project is not consistent with NSW greenhouse gas emissions reduction policy and Net Zero by 2050 goals to deal with climate change.

We believe, in light of the objections outlined above, that the dive site should not be located in Flat Rock Gully

# Crystalline Silica and Contaminated Dust Risks and Proximity to Children

## Flat Rock Gully Site



Industry Specialists State that harmful levels of construction dust such as silica can travel over long distances

| Wind Speed       | Travel Distance   |
|------------------|-------------------|
| 5 km/h (3.1 mph) | 0.9 km (.55 mile) |
| 10 (6.2 mph)     | 1.8 (1.1 miles)   |
| 20 (12.4 mph)    | 3.7 (2.3 miles)   |
| 40 (24.8 mph)    | 7.4 (4.6 miles)   |
| 60 (37.3 mph)    | 11.1 (6.9 miles)  |
| 80 (49.7 mph)    | 14.8 (9.2 miles)  |

(Ref: <http://www.citicite.com/files/Uploads/1220/Dust%20Particulant%20Distance%20Travel%20and%20Impacts%20on%20Adj%20Properties,%20incl%20Resp%20&%20Allergic%20Immune%20Responses.pdf>)