

# NORTHBRIDGE

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PROGRESS ASSOCIATION

## EXECUTIVE SUMMARY

The Northbridge Progress Association (“NPA”) is a 100-year-old, not-for-profit, volunteer association which advocates on behalf of Northbridge to preserve or improve for its residents, the amenity and environment of the suburb. Northbridge is a strong community with over 6300 residents, proud of the physical attractions of our peninsular suburb and indigenous heritage.

In preparing this submission, members of the NPA Committee have reviewed the extensive EIS documentation for the Beaches Link and Gore Hill Freeway construction project (Beaches Link) and other recent major roadway projects, attended Beaches Link information sessions, consulted with local associations and clubs and received some independent expert advice. The NPA held a Special General Meeting on 24th February 2021 (to a COVID safe audience of 100 residents), at which Transport for NSW virtually attended and responded to local concerns. Our committee then presented the proposed approach to the submission and received feedback by facilitating discussion and collecting survey results.

Given the proposed design and tunnel path for the Beaches Link, the construction timeline and the overarching risk profile of this major infrastructure project, the potential impact on the residents of Northbridge during and post construction is significant and undeniable.

The NPA is submitting an objection to the Beaches Link, together with clear actionable initiatives our community expects the Government to adopt to mitigate the impacts on Northbridge, should the project proceed.

In assessing the EIS for the Beaches Link, we have taken particular note of the NSW Parliament - Upper House Public, Accountability Committee inquiry into the impact of the WestConnex project. We acknowledge the response from the Minister for Transport and Infrastructure tabled 17<sup>th</sup> June 2019 in NSW Parliament. Committee Chairman, Reverend the Hon Fred Nile MLC stated when the report was tabled, 'Major infrastructure projects cannot be delivered without a certain amount of disruption. However, it is clear that WestConnex has had a significant and pronounced impact on local communities and families. I sincerely hope that some of the report's findings and recommendations may make life a little easier for those impacted'.

We acknowledge that major infrastructure projects take into account broader considerations for Greater Sydney. However, the WestConnex inquiry report's findings are aligned with the general concerns of the Northbridge community given the risk profile and potential impacts for Northbridge's residents of such a large-scale infrastructure project.

The Northbridge community has legitimate concerns given the severe impacts experienced by other communities through recent major projects in Sydney. To meet community expectations, a considerable number of the relevant recommendations from the WestConnex inquiry should be adopted and implemented in full for Beaches Link in order to minimise the impacts for the residents of Northbridge.

The measures adopted for Western Harbour Tunnel are largely consistent with the relevant recommendations from the WestConnex inquiry, however, we believe that certain aspects of the reporting framework require refinement to ensure that dissemination of information is transparent and timely.

We support the report's focus on:

- achieving greater transparency in delivering major infrastructure projects
- improving community consultation and complaints handling; and
- addressing construction impacts and preserving community amenities.

The general concerns of the Northbridge community are centered around:

- Existing contaminated landfill
- Bushland preservation
- Construction traffic
- Noise and vibrations
- Air and water quality
- Access and amenity
- Property impacts

These concerns arise across three areas within Northbridge:

- Flat Rock drive temporary construction site
- Middle Harbour temporary construction site
- Northbridge corridor (pre & post construction)

Our submission includes specific recommendations on important matters for our community including bushland rehabilitation, compensation for local organisations particularly impacted by the project, protection of aboriginal heritage and the scope of property pre-assessments. Our submission is also focussed on arrangements for ongoing monitoring and consultation to manage risks, mitigate impacts and ensure effective communication with the community through the construction and operational period.

Our community has clear expectations that material changes on key issues that impact them e.g. deterioration in air quality above threshold levels; noise during construction above agreed thresholds; water quality changes that materially impact the use of Middle Harbour (in particular; Northbridge Baths, sailing and Sea Scouts) are communicated in a timely manner).

We have noted that conditions of consent for Western Harbour Tunnel includes under Part B, Community Information & Reporting, a range of measures to communicate with local communities i.e. the Community Communication Strategy. The measures adopted for Western Harbour Tunnel are consistent with our general expectations however, we believe that certain aspects of the reporting framework require refinement to ensure that dissemination of information is transparent and timely.

We recommend the performance of the construction project in identified key risk areas is communicated regularly in accessible formats, such as dashboard information presented in public community areas and online, in order to inform and engage the community. Consistent with the Western Harbour Tunnel consents, timely communications are required for any material breaches or triggers from key issues.

Northbridge Progress Association is the most appropriate body to represent the interests of Northbridge during all stages of the Beaches Link project and request representation on all relevant committees e.g. Air Quality Community Consultative Committee.

Our community has highlighted the importance of transparency and accountability of government. We note the appointment within the Western Harbour Tunnel conditions of consent of independent Environmental Representative, Acoustics Advisor(s), Independent Auditor, Public Liaison Officer(s), Community Complaints Mediator and Air Quality Independent Reviewer and believe this needs to continue within the Beaches Link Project.

The NSW Government must monitor and publicly report on the new Community Complaints Mediator for the project to ensure that the improvements being sought regarding community engagement and complaints handling are achieved. There must be a centralised complaints management system that is accessible 24/7, transparent and empowered to respond effectively in a short time frame.

The NPA is objecting to the Beaches Link as described in the EIS.

Should the Beaches Link proceed, the NPA strongly believes the NSW Government needs to address our concerns and recommendations to ensure community expectations are met. The NPA are committed to advocating for our community through this project assessment and have set up a sub-committee skilled with government regulatory experience at the highest level, legal, accounting, community engagement and external environmental management advisory support.

The Beaches Link will be a priority agenda item at future committee meetings to ensure we are vigilant and advising our residents with regular updates to hold the government accountable going forward.

Yours sincerely



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To appreciate the beauty of our area and the time we invest into our community please visit [Northbridge.202](http://Northbridge.202)



## Northbridge Progress Association submission to Transport NSW regarding Beaches Link Tunnel EIS - Concerns and Recommendations

1 March 2021

| Risk identified in EIS   | EIS unmitigated risk rating | EIS residual risk rating | NPA Concerns  | NPA Recommendations   |
|--|-----------------------------|--------------------------|---|---|
| <b>Traffic and Transport</b>   |                             |                          |   |   |
| <ul style="list-style-type: none"> <li>Construction traffic impacts on road network performance</li> <li>Local road and parking impacts</li> </ul> | High                        | Medium                   | <p>Flat Rock Drive is a major transport corridor for commuters and local schools. Despite the traffic projections showing minor impacts on local roads in and around Northbridge with mitigation measures in place, we are concerned that the additional traffic light on Flat Rock Gully, significant number of daily construction truck traffic movements and local parking by construction staff will lead to traffic and parking spillovers on local streets.</p> | <p>That NSW Government require:</p> <ul style="list-style-type: none"> <li>Monitoring agreed pre-determined criteria for traffic flow efficiency on Brook Street/Flat Rock Drive/Sailors Bay Road/Alpha Road, breaches of which will trigger consideration of mitigation actions in consultation with the community</li> <li>Demonstration to the community of safe pedestrian and cyclist access around Flat Rock Gully and Willoughby Leisure Centre</li> <li>Consultation with the community prior to finalising the Construction Parking and Access Strategy</li> <li>That construction vehicles are prohibited from access to the Middle Harbour construction site from Sailors Bay Road</li> <li>Commitments for timely response to community complaints regarding</li> </ul> |

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|---|-----------------------------|--------------------------|---|---|
|   |                             |                          |   | <p>traffic and parking during construction</p> <ul style="list-style-type: none"> <li>Timely monthly publication and/or sharing with the NPA of the number of complaints received regarding traffic and parking and how these are being addressed</li> </ul>  |
| <ul style="list-style-type: none"> <li>Temporary maritime traffic impacts to recreational users, community groups and clubs, commercial and government operations.</li> </ul> | High                        | Medium                   | <p>Barge traffic, restrictions on Middle Harbour navigation and the potential for water contamination will adversely affect operation of Northbridge Sailing Club, Northbridge Sea Scouts and potentially Northbridge Baths and the Northbridge Amateur Swimming Club. These are valued community-run organisations and their viability may be threatened as a result of the project.</p> | <ul style="list-style-type: none"> <li>That the NSW Government implement the recommendations put forward in submissions of the Northbridge Sailing Club and Northbridge Sea Scouts including a commitment to funding for compensation for loss of access</li> <li>A condition of approval to liaise with the Northbridge Sailing Club, Northbridge Sea Scouts and Northbridge Amateur Swimming Club before and throughout the project to address concerns about water quality, safety and continued recreational use of Middle Harbour.</li> <li>That that the NSW Government provide a commitment to compensation for the Northbridge Amateur Swimming Club in the event it needs to cease operations due to contamination or other obstruction caused by the Beaches Link project.</li> </ul> |

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|   |                             |                          |   | <ul style="list-style-type: none"> <li>That the NSW Government together with Willoughby City Council consult with the Northbridge Amateur Swimming Club and the NPA and develop a plan regarding any need for potential closure or changes to the operation of Northbridge Baths during construction</li> </ul>   |
| <b>Noise and vibration</b>  |                             |                          |   |   |
| <ul style="list-style-type: none"> <li>Ground-borne noise impacts during tunneling</li> <li>Airborne noise impacts from surface works during standard construction hours</li> <li>Construction vibration impacts during standard construction hours.</li> <li>Noise and vibration impacts outside of standard construction hours from surface works.</li> </ul> | High                        | Medium                   | <p>Our concerns are based on the high inherent risk rating including material impact on Northbridge residents from construction noise due to activities at Flat Rock Drive (BL2) and for residents exposed to noise from the Middle Harbour construction sites.</p> <p>We are concerned that given the nature of the construction activities, the mitigation measures may not be adequate, leading to significant negative impact on health and wellbeing of Northbridge residents.</p> | <p>That all relevant noise management, mitigation and consultation provisions in the Western Harbour Tunnel (WHT) approval are made conditions of approval for Beaches Link Tunnel.</p> <ul style="list-style-type: none"> <li>Consistent with the WHT approval, that a suitably qualified Acoustics Advisor must be nominated for the duration of the construction phase</li> <li>This expert should be employed by and report to an appropriate NSW Government body independently of the design and construction contractors</li> <li>The NPA and other community organisations should have direct access to the Acoustics Advisor for information and consultation on additional mitigation measures as needed.</li> </ul> |

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|  |                             |                          |   | <ul style="list-style-type: none"> <li>• The Acoustics Advisor to publish or provide the NPA with a monthly report on noise and vibration levels and any breaches</li> <li>• That the NSW Government formalise the process for responding to noise level excesses and complaints</li> <li>• That the NSW Government commit to timely publication on at least a monthly basis of summary statistics from the Complaints Register relating to noise level excesses</li> <li>• In order to undertake out-of-hours work, the contractor to identify appropriate respite periods in consultation with the community</li> </ul> |
| <b>Air quality</b>   |                             |                          |   |   |
| <ul style="list-style-type: none"> <li>• Local air quality impacts due to dust generation</li> </ul> | High                        | Medium                   | We are concerned about potential material impact to local air quality, and in turn health and wellbeing of residents, due to dust generation, potential disturbance of asbestos or other airborne contaminants within the historical landfill site and odour impacts from construction activities at Flat Rock Drive (BL2) despite mitigation measures. | <p>That the NPA is represented on the Air Quality Community Consultative Committee (AQCCC)</p> <p>That the NSW Government include as a condition of approval:</p> <ul style="list-style-type: none"> <li>• Independent regular monitoring and reporting to the AQCCC of dust generation and dust levels at Flat Rock Gully</li> <li>• The nature and timing of external communication to the</li> </ul>   |

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|  |                             |                          | Timely community notification of any air quality breaches including dust levels, along with clear action plans, is critical to protect vulnerable members of our community.  | <p>community should dust management plans be rated ineffective, with cessation of operations at BL2 until remedial measures have been planned and implemented</p> <ul style="list-style-type: none"> <li>Formalisation of, and ongoing monitoring/ reporting on commitments made in relation to Air Quality, Emissions Controls and other measures to the NSW Government and the AQCC</li> </ul>  |
| <b>Aboriginal heritage</b>   |                             |                          |  |   |
| <ul style="list-style-type: none"> <li>Indirect impacts to terrestrial Aboriginal heritage sites due to vibration and settlement.</li> </ul> | Low                         | Low                      | The Clive Park cave site is unique and fragile and we are concerned that the risk assessment may not adequately reflect the potential for damage due to vibration or inadvertent interference with the site during construction. | <p>That an aboriginal heritage specialist make recommendations for protection and preservation of the Clive Park aboriginal site</p> <ul style="list-style-type: none"> <li>Resulting recommendations made a condition of approval</li> <li>Archival recording to be made of all significant artefacts</li> </ul> <p>A condition of approval that no construction equipment, vehicles or project staff are to be placed on, access or enter Clive Park Reserve from land or water other than in emergency</p> |
| <b>Geology, soils and groundwater</b>  |                             |                          |  |   |

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| <ul style="list-style-type: none"> <li>• Disturbance of contaminated land or groundwater contamination during construction works</li> <li>• Marine contamination during dredging activities</li> </ul> | High                        | Medium                   | <p>The Northbridge community is very concerned about the potential for harmful contaminants from the historical landfill site at and adjacent to BL2 site and in Middle Harbour sediment to contaminate the creek and waterways, potentially affecting health and safety for residents and in particular those using Northbridge Baths, Willoughby Leisure Centre recreational facilities and Flat Rock Creek paths.</p> <p>The EIS notes the high likelihood of encountering groundwater contamination at the Flat Rock Gully area as well as potential for landfill gas from the historical landfill materials. We are concerned the project will exacerbate existing contamination problems whereas this project should be an opportunity to put in place a long-term remediation plan.</p> | <p>That the NSW Government working with Willoughby City Council commit to developing a long-term plan for remediation of contaminants at the historical landfill site as well as improving containment of stormwater run-off and associated rubbish accumulation at Flat Rock Gully</p> <p>That the NSW Government make a condition of approval:</p> <ul style="list-style-type: none"> <li>• Storage of any contaminated spoil sites away from community recreational spaces and living areas</li> <li>• Community awareness as early as possible in the construction process as to the extent and nature of disturbed contamination and potential impacts on users of adjacent facilities</li> <li>• Monitored controls to prevent the likelihood of runoff into streams and waterways to be included as conditions of approval</li> <li>• Ongoing testing of water in Flat Rock Creek for contaminants and timely community notification of any breaches</li> <li>• Preparation of a Remediation Action Plan by appropriately qualified</li> </ul> |

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|--|-----------------------------|--------------------------|---|--|
|  |                             |                          |   | experts for the landfill site at Flat Rock Gully to be shared with NPA   |
| <b>Hydrodynamics and water quality</b>   |                             |                          |   |  |
| <ul style="list-style-type: none"> <li>Marine water quality impacts from increased turbidity and sedimentation from dredging</li> </ul>  | High                        | Low                      | The NPA is concerned about release of toxic chemicals and heavy metals into Middle Harbour waterways, affecting our ability to safely use community facilities such as Northbridge Baths and potentially harming marine life  | <p>That the conditions of approval include:</p> <ul style="list-style-type: none"> <li>At least weekly testing and reporting of contaminant levels in Middle Harbour, in particular around Northbridge Baths and Clive Park Reserve</li> <li>Timely community notification of any breaches of acceptable contaminant level</li> </ul>  |
| <b>Biodiversity</b>  |                             |                          |   |  |
| <ul style="list-style-type: none"> <li>Impact on native vegetation, groundwater dependent ecosystems and threatened ecological communities.</li> <li>Impacts to fauna habitat, including aquatic and marine habitats</li> <li>Impacts on threatened fauna species and endangered populations.</li> </ul> | High                        | Medium                   | <p>The Northbridge community has spent decades on volunteer bush regeneration activities in the Flat Rock Gully area, which now provides immense natural amenity to local residents and visitors as well as forming part of the local green corridor for wildlife habitat and movements.</p> <p>We are concerned this beautiful area and its flora and fauna will be permanently affected by the construction project and we do not</p> | <p>That the NSW Government make a condition of approval that Flat Rock Gully construction site BL2 be rehabilitated to an enhanced bushland state post-construction</p> <ul style="list-style-type: none"> <li>That this rehabilitation be undertaken working together with organisations such as Bushcare Australia and Birdlife Australia to enhance the habitat for Powerful Owls and improve biodiversity.</li> </ul> <p>Consistent with the WHT approval,</p> |

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|  |                             |                          | <p>view biodiversity offsets elsewhere as sufficient.</p> <p>We are concerned about removal of trees, impact to habitat of species such as the powerful owl and marine species in Middle Harbour.</p> | <p>a Flora and Fauna Environmental Management subplan and Dredging Monitoring Program to include:</p> <ul style="list-style-type: none"> <li>• Details for undertaking pre-clearing/demolition inspections for native fauna including threatened species by a suitably qualified ecologist</li> <li>• Methods and procedures for welfare and relocation of displaced fauna</li> <li>• The locations of sensitive marine habitats in the vicinity of dredging locations that are potentially sensitive to elevated suspended sediment concentrations and procedures for mitigating impacts</li> <li>• Specific measures to protect little Penguins and marine mammals near maritime construction sites</li> <li>• Specific measures to minimise disturbance to habitat associated with White's seahorse and Powerful Owl</li> </ul> |
| <b>Socio-economics</b>   |                             |                          |   |  |
| <ul style="list-style-type: none"> <li>• Temporary impacts on social infrastructure and community values during construction</li> <li>• Impacts to businesses during construction (access, parking etc)</li> </ul> | High                        | Medium                   | As noted above, there will be significant adverse use and access impacts on the Northbridge Sailing Club, Sea Scouts and Northbridge Amateur Swimming Club.   | The NPA supports the submissions from the Northbridge Sailing Club and the Northbridge Sea Scouts and represents Northbridge Amateur Swimming Club in  |

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| <ul style="list-style-type: none"> <li>Access and connectivity impacts during construction</li> </ul>                                    |                             |                          | <p>Amenity for residents and visitors at Clive Park Reserve and the small beach and remnant tidal baths will be significantly reduced during construction due to noise and barge traffic.</p>               | <p>being compensated for any operating losses.</p> <p>That the NSW Government commit to funding compensation for any permanent damage, including contamination to; Clive Park Reserve, Northbridge Baths, the tidal baths or Flat Rock Gully through remediation and provision of commensurate public reserve enhancements such as improved pathways or facilities</p>  |
| <b>Hazard and risk</b>   |                             |                          |   |   |
| <ul style="list-style-type: none"> <li>Ground movement (settlement) or geotechnical uncertainty causing damage to properties.</li> </ul> | Medium                      | Low                      | <p>We are aware that the potential for settlement and other property damage due to tunneling activity and uncertainty about final tunnel locations are creating unnecessary anxiety for local residents</p> | <p>That NSW Government include as a condition of approval that property damage assessments will be available for all Northbridge property owners, not only those in close proximity of the tunnel route</p> <ul style="list-style-type: none"> <li>At the owner's option, a damage assessment to be conducted by an assessor independent of the project contractors</li> <li>Damage remediation to be carried out by a contractor and to timelines acceptable to the owner</li> <li>The dispute resolution mechanism must consist of qualified experts who are independent of the project contractor</li> </ul> |

