

416 Group submission on proposal to use 160 Wicks Road (Porters Creek) as a construction support site for the Warringah Freeway Upgrade - 23.9.22

Dear Transport for NSW

Please accept this submission from the 416 Group regarding the proposal to use Wicks Road as a construction support site for the Warringah Freeway Upgrade with operations forecast to last five years and to operate 24 hours, seven days a week. This submission is after the due date for the reason set out in my previous email. Please note also that in our email of 5 May 2022 we asked that the 416 Group be registered as a stakeholder and this has not occurred, and no communication to the Group has been received regarding the proposal. Details regarding the 416 Group can be found on its website here: <https://www.416group.org>

Alternative locations

No information has been provided in the August 2022 flier *Warringah Freeway Upgrade* regarding the alternative locations assessed for a Construction Materials Recycling facility. We would expect these to have included the sites uses for North Connex and the Sydney Metro. Also, the option of transporting spoil to a final destination to avoid double handling has not been listed.

Porters Creek/Wicks Road

Use of the Porters Creek site for noisy activities has a 25-year history of conflict with local residents and the National Park. The impact of the noise on residents was the reason the 416 Group was originally established. The installation of stacked shipping containers to form a sound barrier was judged a placebo and made only a little practical difference. The problem was not resolved until the Porters Creek operator ceased green waste grinding activity. In 2021 the 416 Group again had cause to make representations to Ryde City Council regarding bulldozing activity that was impacting residents. The Porters Creek gully funnels noise directly across the Lane Cove valley to residents in Killara and Lindfield. Many homes have bedrooms with windows that are south/southwest facing. In the past, morning activity has been a particular problem. Whilst the nearest residential properties are 500 metres away, the lived experience of the people living in those properties has been that noise disturbs and in particular it impacts on sleep. This noise has included from the operation of heavy machinery, steel on steel, reversing, dumping, grinding and crushing.

The Wicks Road site has not previously been permitted to be used for 24-hour activity.

Acoustic monitoring was conducted in early 2022 behind 57 Albert Drive. I repeat my request of 5 May that the report of that investigation be made available. It will be the 416 Group's intention to exercise its rights through the Environment Protection Authority and under the relevant legislation.

Lane Cove National Park

The Lane Cove Valley is a gazetted National Park. Its role in preserving diversity of flora and fauna is highly valued. At night the Park is very quiet and during the Sydney airport curfew from 11.00pm to 6.00am it is almost silent. Due to the steep topography of the valley, there is

minimal light pollution from Macquarie Park. Much of the fauna is nocturnal. By way of example near the Riverside Drive bridge over Porters Creek a pair of rare and endangered powerful owls are nesting.

Planning process

The information flier says that the proposed construction and operation of this site was not identified during the Waringah Freeway Upgrade Environmental Impact Statement process. That the proponent will now be requesting modification to the project's Conditions of Approval with the Department of Planning and Environment. It claims that detailed planning and investigations have been carried out to understand how the operation of the site will impact residents and to identify appropriate mitigation measures. This detailed planning has involved until August 2022 no consultation with residents.

Apart from retaining vegetation and dust suppression the only mitigation proposed appears to be "12 metre long stacked shipping containers along the southern boundary and north-eastern boundary as noise wall". As noted above such a barrier was previously ineffective at containing noise.

No Environmental Impact Statement has been prepared for this site and there is no explanation as to why CPBDowner as the proponent believes an Environmental Impact Statement is not required.

The community consultation has been limited to a flier dated 31 March 2020 (meant 2022) regarding noise monitoring and a second flier in August 2022 with a short response time for feedback. It is not known how extensively the leaflet was distributed. To our knowledge no information has been posted in local media or social media to raise awareness of the proposal. Residents at work were not able to attend two day-time drop-in sessions convened in Ryde.

We submit that the proposal should be subject to an EIS and that the Department of Planning and Environment should not consider the application without a proper process.

Julian Ledger

President, 416 Group

23 September 2022