

## NSW Parliamentary Inquiry into the Western Harbour (WHT) and Beaches Link tunnels (BLT)

(a) the adequacy of the business case for the project, including the cost benefits ratio  
The business case has not been released, so it is not possible to judge.

(b) the adequacy of the consideration of alternative options:  
The only alternatives considered in the WHT and BLT Environmental Impact Statements (EISs) were motorway tunnels in different alignments, and a cursory reference to public transport alternatives. Congestion pricing was not considered at all.

Despite the environmental impacts, the contamination risks and the construction impacts, the EISs give no serious consideration to alternatives.

### Public Transport

The WHT EIS does not assess the impact of the B-line buses on congestion on the Harbour Bridge and Military Road. Nor does it take account of the possible impact of a rapid and frequent public transport link between the identified growth area around Frenchs Forest and Chatswood when combined with the metro to the city to be completed in 2024. The metro will have an estimated Chatswood to Barangaroo trip time of 9 minutes (11 minutes to Martin Place) and a departure every 4 minutes.

The BLT EIS mentions the planned rapid bus service from Dee Why to Chatswood operating in conjunction with the new metro but blithely dismisses its potential impact with:

While these projects would contribute to reducing congestion... they would not be sufficient to resolve the existing road network capacity constraints between the lower North Shore and the Northern Beaches. This is due to the complexity of journey patterns and trip purposes within Greater Sydney and the dispersed nature of origin and destination points for an individual journey.

No mention is made of Census journey to work data showing that 52.1% of Northern Beaches residents work in their own Local Government Area (LGA) and 65% of the remainder work in either the City of Sydney, North Sydney, Willoughby or Ryde LGAs. Given that the EIS refers to the Military Road/Spit Road and Warringah Road/Eastern Valley Way corridors generally operating over capacity during peak periods but not at other times, journey to work data becomes particularly relevant.

The BLT EIS shows that the Warringah Road corridor is both busier and more congested than the Spit/Military Road corridor while being less used by public transport, reinforcing the need to consider public transport alternatives utilising this corridor.

There is no question of capacity constraints with the BLT EIS stating that the metro will provide a capacity increase of 100,000 passengers an hour.

(c) The cost of the project, including the reasons for overruns.  
No comment

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

No comment

(e) the extent to which the project is meeting the original goals of the project

No comment

(f) the consultation methods and effectiveness, both with affected communities and stakeholders

Both the WHT and BLT EISs were released at Christmas, when public focus is distracted, and were then open for comment across a month or more of school holiday breaks when schools were closed (and Parents & Citizens Association not convened) and parents across the area preoccupied with caring for children. The difficulty of this timing for the community was exacerbated by the restrictions imposed by the COVID19 pandemic on meetings, community gatherings, libraries and access to computing equipment.

Misleading statements

The consultation documentation is full of misleading statements and opaque analysis. Misleading statements have been made in the EISs and prior information documents regarding expected travel time savings from the projects. It is never made clear that projected time savings are not based on current travel times but rather on projections of a future if planned densification in areas such as French Forest and Mona Vale goes ahead.

Misleading statements have also been made in the EIS for the BLT (page 3.2) as to the impact of COVID-19 on future traffic volumes on relevant routes, by stating that traffic has returned to pre-COVID levels without considering the substantial but temporary decline in public transport patronage.

Artist impressions in consultation documents have been misleading by, amongst other things, understating the visual impact of ventilation stacks in the Balgowlah area, and understating the gradients along Flat Rock Drive which will have traffic lights installed near its lowest point to enable heavy vehicle access. Motorway facility sheds are shown in distant views and camouflaged green.

Historical analysis of previous land use has ignored potential sources of dangerous contaminants such as the Hallstrom refrigerator plant, despite it being mentioned in the historical study referred to in the EIS.

Intersection modelling has been made opaque by using performance bands, rather than time periods.

(g) 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

The projects have proceeded on the basis that COVID-19 will have no impact on the traffic volumes on which the projects' benefits are predicated whereas evidence suggests that COVID-19 will lead to lower traffic volumes than those predicted.

As opposed to the statement in the BLT EIS, the evidence suggests that COVID-19 is likely to result in lower traffic levels than predicted due to reduced population growth and a greater degree of working from home.

For instance, Infrastructure Australia's December 2020 report Infrastructure beyond Covid-19 states:

A 2020 Gartner CFO survey reports that 74% (CFOs) expect a shift whereby some employees remote work permanently, indicating significant uncertainty for CBDs following COVID-19.

In similar vein, The Sydney Morning Herald of 20 April 2021 quotes the NSW Chief Economist, Stephen Walters:

We are not coming in 100 per cent five days a week and so the reality is the demand for office space is not going to be what it used to be.

As regards population growth, the Australian Government Centre for Population website states:

The impact of COVID-19 is expected to be long lasting. Australia's population is expected to be smaller and older than projected prior to the onset of the pandemic. Australia's population is estimated to be around 4 per cent smaller (1.1 million fewer people) by 30 June 2031 than it would have been in the absence of COVID19. The population will also be older as a result of reduced net overseas migration and fewer births. Despite COVID-19, Australia's population is still growing and is expected to reach 28 million during 2028–29, three years later than estimated in the absence of COVID-19.

COVID-19 is projected to slow population growth across all geographic areas, with the duration and magnitude linked to the importance of net overseas migration to different parts of the country.

Capital cities are projected to bear the heaviest impacts, with total population across capital cities estimated to be around 5 per cent lower by 30 June 2031 than in the absence of COVID-19. By contrast, population outside the capital cities is estimated to be around 2 per cent smaller than it would otherwise have been.

(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts

(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body  
The failure to publish the business case, and the failure of the EISs to include relevant matters means that the projects fail to meet the levels of transparency and accountability which taxpayers are entitled to expect.

The failure to consider and compare alternatives becomes of particular concern given the failure to release the business cases justifying the projects.

Until recently no business case had been submitted to Infrastructure Australia with the result that the BLT in conjunction with the WHT were classified as an initiative rather than a project. The WHT has now been evaluated by Infrastructure Australia with the Project Business Case Evaluation Summary, published in April 2021, showing a benefit to cost ratio of between 1.2 and 1.3. While this evaluation takes into account the costs of some "dis-benefits" mentioned in the Infrastructure Australia summary, the question of whether the benefits have been properly costed or whether an alternative solution to

the problem would produce a higher benefit to cost ratio, is left unanswered. The Infrastructure Australia summary also notes that "... cost estimates presented in the business case submitted by the proponent to Infrastructure Australia are from 2017".

They do not take into account additional costs such as those which may arise from required remediation measures once comprehensive environmental and contamination assessments are completed.

It should be noted that Glen Searle, town planner, researcher and educator, who is also an Honorary Associate Professor at The University of Queensland and the University of Sydney, gave evidence to the West Connex Parliamentary Inquiry in relation to costs that should have been included in the West Connex business. This list included the costs of:

- upgrading connecting roads which has been estimated as being in excess of \$1billion for the St Peter's interchange alone
  - negative health outcomes to residents from construction-related stress and ongoing noise and pollution stack emissions which will lead to lower property values of houses next to surface sections of the motorway
  - lost heritage value
  - increased congestion costs during construction
  - losses of revenue to businesses adjacent to the project construction or businesses affected by traffic diversions required for construction.
- If the same methodology has been used for the WHT and BLT then these costs may not have been considered.

(j) the impact on the environment, including marine ecosystems  
Wildlife and Habitat

The tunnel works will result in the clearing of over 16 acres of bushland habitat at the top of a catchment with flow on effects to the rest of Flat Rock Gully, Tunks Park, Middle Harbour, the Sailors Bay foreshores, and local and regional north-south and east-west wildlife corridors.

The futures of Flat Rock Gully and the currently pristine foreshores of Clive Park are unclear and part of this bushland/shoreline habitat may be lost to our area forever.

Hundreds of local species will lose their habitat, be driven away by loss of habitat, noise, lights and contamination or bulldozed under during construction.

Numerous threatened species of animals (including the Powerful Owl and microbats) and plants have been identified in the EISs as being affected by the projects and proposed ameliorations are inadequate. The use of biodiversity offsetting to buy credits elsewhere when local animals are lost merely drives species extinctions in our LGA.

Marine

The environmental health of Middle Harbour and foreshores has improved dramatically over the last few decades in terms of the clarity of the water, return of sea organisms and of marine fish and animals. The health of these waters is threatened by the destruction of foreshore areas, dredging of the harbour floor, potential for existing contamination to be redispersed, storing of contaminated materials and the increase in marine traffic on Middle Harbour and across to Spit Point. More than 70 threatened species around Middle Harbour are at risk during construction and from the disruption

of contaminated sediment.

#### Climate Change

Broader environmental impacts such as the climate change impacts of greater car use, compared to public transport have not been considered.

#### Air Quality

The impact on air quality, as compared to the public transport alternatives, has not been considered.

#### Vibration

Proposed ameliorations are insufficient to protect geological and Indigenous cultural features from dangers identified in the EISs due to vibration.

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally  
Processes for responding to threats to residents from contamination have shown themselves to be inadequate. Processes for responding to threats to residents from vibration have, from West Connex experience, also shown themselves to be inadequate.

The lack of compliance with and enforcement of Conditions of Approval (COAs) applying to the WHT demonstrate that the processes aren't working.

#### Failure to protect against risks from contamination

The WHT proceeded to approval with only a preliminary assessment of contamination being completed. This is problematic as many aspects of the project such as waste removal and remediation cannot be planned for without a detailed assessment. The BLT EIS has also not included any detailed assessment, but this is unfortunately not expected to be a barrier to approval given the approval of the WHT without one.

Instead, the Department of Planning Industry and Environment (DPIE) imposed Conditions of Approval (COA) on the WHT which required a Detailed Site Investigation (DSI) to be undertaken, before construction starts, where a site has been identified in the EIS as being at moderate to high risk of being contaminated.

The DSI, which should contain the more detailed contamination assessment, is supposed to be placed on the TfNSW website, before construction starts. There is no requirement that the DSI report remain on the website for a specified time before work commences to enable it to be considered by residents, other stakeholders or regulators such as the EPA, which is itself problematic.

Construction began at the Ridge Street site, within St Leonard's Park, without the DSI report being prepared and published. Standard contamination management measures required by the COA, such as dust screens and run-off controls also appear not to have been implemented, despite the proximity of the site to a pre-school.

Of the three DSI reports prepared to date - Ridge Street, North Sydney, Rosalind Street, Cammeray and Arthur Street, North Sydney – the first two involve a site carved out of a park and one in close proximity to a school, respectively. They do not adequately protect school children, and other sensitive users, as they:

- do not consider impacts, and transmission pathways, off-site as required by the COA
- assess contaminants according to generic industrial/commercial health-based investigation levels rather than the more rigorous recreational/residential levels.

There would be exceedances of benzo(a)pyrene at all sites and lead at Arthur Street if samples at the sites are assessed against recreational/residential levels.

- in Rosalind Street asbestos and polycyclic aromatic hydrocarbons reported in the WHT EIS have been ignored, on the basis that it couldn't be confirmed that the samples referred to in the EIS showing the presence of those contaminants were taken within the site.

The Ridge Street issues were reported to the DPIE, on 9 April but no enforcement action has been taken. The recently published Rosalind St and Arthur St DSIs have also been reported to the DPIE for investigation.

The failure to effectively manage contamination risks directly impacts resident's access to recreation due to identified threats including to Bicentennial Park and Flat Rock Gully from disturbance of a former tip site; and to Middle Harbour (including the learn-to swim site at Clive Park) and Northbridge Baths from disturbance of contaminated sediment.

The projects will also have many other impacts on residents, both during construction and operationally, which could be avoided were alternatives to be considered including the loss of sailing courses in Middle Harbour due to construction of immersed tube tunnels; the loss of visual and aural amenity due to construction of immersed tube tunnels; and traffic impacts including those outlined below.

#### Traffic

Heavier traffic in local streets will make crossing more difficult, especially for kids and the elderly in Cammeray, Neutral Bay and North Sydney.

"The intersection of Ben Boyd Road and Military Road would operate with longer delays as a result of the project due to changes to access and travel patterns at the Ernest Street and Falcon Street interchanges". (p. 236 Western Harbour Tunnel and Warringah Freeway Upgrade Technical working paper: Traffic and transport)

The motorway developers appear to have calculated that extra volume on the motorway system justifies heavier traffic on our local streets and villages. The traffic report shows delays at intersections in the 2027 morning peak by comparing their performance without the tunnel and with the tunnel. The percentage below indicates the extra traffic delay that results from the tunnels:

#### INTERSECTION EXTRA DELAY

Amherst Street/West Street +80%  
 Amherst Street/Miller Street +81%  
 Miller Street/Ernest Street +76%  
 Military Road/Ben Boyd Rd +327%  
 Falcon Street/Merlin Street +46%  
 Berry Street/Walker Street +66%

Data source: WHT&WFU EIS p. 9-23 to 24

Extra delay in local streets means inconvenience for drivers and danger for people walking to school or the shops. Our community is already living with a major motorway cutting through it. This project will enlarge the motorway and concentrate traffic at restricted entry points, encouraging 'rat runs'.

(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths, and

The impact of the projects on nearby public sites includes the permanent loss of 2.8 hectares of community green space, equivalent to four soccer fields, in Cammeray Park; and the impact on areas such as Bicentennial Reserve, Flat Rock Gully, Northbridge Baths and Clive Park mentioned above.

The BLT also poses contamination risks to Tunks Park which is at risk from contamination emanating from the old tip site in Flat Rock Gully, as notified to the EPA by Willoughby Council in February 2021 pursuant to section 60 of the Contaminated Land Management Act.1979.

(m) any other related matter

No comment

## NSW Parliamentary Inquiry into the Western Harbour Tunnel (WHT) and Beaches Link Tunnel (BLT)

My comments refer to the Inquiry Terms of Reference.

a) It is not possible to assess whether or not the business case for the project is adequate as no business case has been released.

When there was a proposal for a Warringah Expressway to pass along the Castlecrag Northern Escarpment, through bushland, in the 1970s/ early 1980s, the business case was a very relevant measure in assessing that proposal.

b) No serious consideration has been given to alternative options in either EIS, in spite of the fact that there are serious environmental impacts, contamination risks (especially at the Flat Rock Gully Dive Site through a former tip) and construction impacts.

No serious attention was given to exploring public transport options.

### Public Transport

The BLT EIS mentions a proposed rapid bus service from Dee Why to Chatswood, operating in conjunction with the new Metro but does not explore this further. It does not register the greater congestion on Warringah Road than on the Military Road Spit Road nor does it appear to have analysed Census data on journeys to work, both of which indicate they need to investigate public transport alternatives using the Warringah Road corridor.

c, d, e) No comment

### f) Consultation

The release of both the WHT and BLT EISs appear to have been timed to reach as few members of the public as possible and to allow only a short time to respond. eg Christmas release, when many people are on holiday, schools are closed, new P&Cs have not yet been convened. Restrictions imposed by COVID only exacerbated these difficulties.

The BLT EIS does not make clear that proposed travel time saving are based on future projections if there is future densification in the Frenshs Forest and Mona Vale areas.

This EIS does not properly consider the impact of COVID -19 which has already resulted in more people working from home, a move which is likely to have a permanent impact on traffic congestion.

Misleading illustrations understate the impact of eg ventilation stacks, motorway sheds and gradients along Flat Rock Drive which will be the entrance to the dive site.

Most importantly

, the BLT EIS ignores the potential contamination resulting from the Hallstrom refrigerator plant where Bicentennial Park is now located, and from the former tip on the eastern side of Flat Rock Drive, through which the dive site will be constructed.

g) the EISs have not considered the impact of COVID-19 on population growth, and work and travel patterns. Rather they appear to consider that there will be no change to pre-pandemic levels, whereas evidence suggests that lower traffic volumes have resulted, due to more people working from home as mentioned. Above, and to reduced population growth. This is borne out on the Australian Government Centre for Population website.

h) The NSW Government most definitely should publish the base-case financial model and the benefit-cost ratio for the project and it's component parts. The Auditor General's Report



referred to in the Sydney Morning Herald (18/6/21) notes cost shifting by the NSW Government obscures the cost of the West Connex Motorway.

D) Appropriate levels of transparency and accountability which the NSW public has a right to expect of a public sector body have not been achieved with these projects. As stated above, the failure to publish the business case, in spite of public requests for same, and the failure of the EISs to include relevant matters, such as contamination, consideration of public transport alternatives, the impact of COVID on traffic volumes etc, result in public suspicion that in fact relevant information on which to base their assessment is being withheld. The Government has failed to properly justify the projects.

j) Impact on the environment including marine ecosystems.

The impact of the tunnel will result in the loss of bushland habitat at the top of a catchment which will have flow-on effects to Flat Rock Gully, Tunks Park, Clive Park and the Sailors Bay foreshores and Middle Harbour. These all contribute to east-west and north-south wildlife corridors. These species rich areas will be devastated by construction works, and the fauna and flora they contain will be bulldozed and carted away to be dumped elsewhere. The use of biodiversity offsets, a questionable mechanism of benefit only to developers, will not restore the fauna and flora which currently exist on the Flat Rock dive site. Those fauna which are not immediately impacted, ie killed, on adjoining areas will be impacted by noise, lights and vibration. Also, not to be forgotten is the importance of these bushland sites for public recreation and education.

Having been personally involved in the reclamation and regeneration of bushland on the old tip site, the proposed destruction is particularly upsetting.

The good environmental health of the marine environment today supports species such as seals and even the occasional whale. The foreshore areas, particularly around Clive Park, Northbridge, are highly valued by the community and are also the site of community recreation and Learn-to-Sail projects from the Northbridge Sailing Club. Nearby in Sailors Bay, Northbridge Baths is also a popular recreation spot for the local community. All these activities are threatened by the BLT proposal which will destroy foreshore areas, dredge the sea floor, potentially disturbing and dispersing contaminated materials currently locked in the sediment, destroying marine habitat and the marine animals therein.

Climate Change has not been considered in the EISs.

The resistance to instal filtration in the ventilation stacks is unacceptable. Air quality has not been properly considered. Failure to give proper consideration to public transport is a lost opportunity to improve air quality.

There is concern that vibration will damage items of indigenous heritage as well as local homes.

k) The experience of home owners of the West Connex construction does not give any confidence to home owners in the area of the BLT. Those processes have been demonstrated to be inadequate. Similarly the processes to protect home owners from contamination have also been shown to be inadequate.

As with the WHT EIS, the BLT EIS has not included a detailed assessment of aspects of the project such as contamination and waste removal. This should precede any commencement of work and in fact should be addressed in the EIS so that it's adequacy can be assessed.

A Detailed Site Assessment, where moderate to high risk of contamination exists, as in Flat Rock Gully, should be placed on the TfNSW website before construction starts. The fact that there is

no requirement for a DSI to remain on the website so that residents and those qualified can assess its adequacy is not acceptable.

Failure to effectively manage contamination will affect the recreation activities and access to Flat Rock Gully, Bicentennial Park, and Middle Harbour, particularly Sailors Bay and result from the initial failure to consider alternatives to the dive site at Flat Rock Gully and the Middle Harbour crossing at Clive Park.

Local traffic circulation will become more difficult during and after construction of the BLT. The proposal to funnel all traffic onto Willoughby Road is a major problem. One point not often considered is that the shortest and quickest route taken by ambulances from the northern area to Royal North Shore Hospital is via Flat Rock Drive. Having to divert to Willoughby Road may make a difference between life and death. Also the proposed major development of the Channel 9 site, which will also impact Willoughby Road during construction, will impose a heavier traffic load once the tunnel is completed. Heavier traffic on local roads is not an acceptable trade-off for this project.

l) The BLT impacts are not restricted to the tunnel route alone. They include permanent loss of public green space in Cammeray, on Bicentennial Reserve, Flat Rock Gully, Tunks Park, Clive Park and Northbridge Baths, all of which have been previously mentioned. Tunks Park is also at particular risk from contaminants being released from the old tip site in Flat Rock Gully, which was notified to the EPA and Willoughby Council in February 2021.

Dear Chair, Daniel,

I am a resident of Cammeray and Chair of my neighbourhood precinct committee. I am also a member of the NSW State Design Review Panel and I periodically chair Design Excellence Panels in Bayside, Randwick and Gosford. Earlier in my career, I also involved in the urban design of the Lane Cove and Cross City Tunnels.

Thank you for this initiative to undertake the Inquiry which you chair. These past two I have been striving together with members of my community and my professional colleagues have been mightily striving to point out some serious shortcomings. (Always with a view to constructive suggestions to solve these). To date, these seem to have gained very little traction. So your enquiry is very important.

Major issues and impacts:

The business case has not been released, so it is not possible to judge

Alternative “options” only considered motorway tunnels in different alignments - not alternative transport options

Consultation documentation is full of misleading language and diagrams

Permanent loss of 2.8 Ha of community green space equivalent to four soccer fields in Cammeray Park

Double exhaust stacks at Ernest Street Bridge (to expel pollution from BOTH Harbour & Beaches Tunnel) 250m from ANZAC Primary School

Flat Rock Creek Gully construction site (Next to Willoughby Leisure Centre) will disturb old rubbish tip and additionally expel waste into the creek to Tunks Park and Middle Harbour

Heavy truck movements for tunnel excavation along Brook Street and Flat Rock Creek Drive

Health and safety risks associated with the construction and operation of the tunnel are higher than alternative due to the current alignment and proximity to so many schools

Please see the attachments and some additional notes below:

Misleading Consultation & Information

Important information was not provided, including the Business Case; design options

(alignments, portal positions). Consultation documentation is full of misleading language and diagrams (e.g., “Freeway Upgrade” terminology used instead of “Motorway Expansion”; traffic modelling refers to “Do nothing & do something” rather the “without project & with project”.

Environmental Impacts Assessment fails to present the impacts; for example the, Motorway facility sheds are only shown in distant views and camouflaged green.

Loss of Public Green Space

Permanent loss of 2.8 Ha of community green space (equivalent to four soccer field) in

Cammeray Park will become motorway sheds and exhaust pumping station (see attached Westconnex M5 for a photo of a similar facility and EIS drawings showing parkland to be lost).

Transport NSW ignored requests during the consultation period to mark out the area of parkland lost or erect height poles to indicate the position and scale of the proposed sheds. A recent announcement has indicated that some part of the planned facilities will be at Artarmon Industrial area. However, areas of land now required have not been given.

Traffic Impacts on Local Streets

Heavier traffic in local streets will make crossing more difficult, especially for kids and the elderly in Cammeray, Neutral Bay and North Sydney.

“The intersection of Ben Boyd Road and Military Road would operate with longer delays as a result of the project due to changes to access and travel patterns at the Ernest Street and Falcon Street interchanges”. (p. 236 Western Harbour Tunnel and Warringah Freeway Upgrade Technical working paper: Traffic and transport)

The calculus for the motorway developers has been that extra volume on the motorway system justifies heavier traffic on our local streets and villages. We must let them know that is not acceptable. The traffic report shows delays at intersections in the 2027 morning peak by comparing their performance without the tunnel and with the tunnel. The percentage indicates the extra traffic delay that results from the tunnels:

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Extra delay in local streets means hassle for drivers and danger for people walking to school or the shops. Connecting motorways to busy local streets is like trying to get a drink from a fire hose! Our community is already living with a major motorway cutting through it. This project will enlarge the motorway and concentrate traffic at restricted entry points, encouraging ‘rat runs’.

Each of these issues can be solved or mitigated with better design.

I would like to address the committee directly in person. Please let me know how to proceed in this regard.

Best Wishes,

Paul Walter

## Submission to Parliamentary Inquiry into the tunnels project

I am a resident of Amherst Street Cammeray and have many concerns about the proposed tunnel project.

**Alternative options** I am very concerned that there has been no consideration of alternate options including public transport options, in particular a rail link from the norther beaches to Chatswood. There is no reference to this alternative in the documentation. In fact, the business case has never been released. Alternative “options” only considered motorway tunnels in different alignments - not alternative transport options.

**Misleading and inadequate information** Important information was not provided, including the Business Case; design options (alignments, portal positions). Consultation documentation is full of misleading language and diagrams (e.g., “Freeway Upgrade” terminology used instead of “Motorway Expansion”; traffic modelling refers to “Do nothing & do something” rather than “without project & with project”. Environmental Impacts Assessment fails to present the impacts; for example the Motorway facility sheds are only shown in distant views and camouflaged green. These buildings are much larger than shown on the plans.

**Loss of Public Green Space** Loss of 2.8 Ha of community green space (equivalent to four soccer fields) in Cammeray Park will become motorway sheds and exhaust pumping station. Transport NSW ignored requests during the consultation period to mark out the area of parkland lost or erect height poles to indicate the position and scale of the proposed sheds. Attachment 1

**Impact on the local environment** Permanent loss of 2.8 Ha of community green space equivalent to four soccer fields in Cammeray Park. Double exhaust stacks at Ernest Street Bridge (to expel pollution from BOTH Harbour & Beaches Tunnel) 250m from ANZAC Primary School. Flat Rock Creek Gully construction site (Next to Willoughby Leisure Centre) will disturb old rubbish tip and additionally expel waste into the creek to Tunks Park and Middle Harbour. Health and safety risks associated with the construction and operation of the tunnel are higher than alternative due the current alignment and proximity to so many schools.

### Traffic Impacts on Local Streets

**There will be Heavier traffic in local streets.** The calculus for the motorway developers has been that extra volume on the motorway system justifies heavier traffic on our local streets and villages. This is not acceptable. The traffic report shows delays at intersections in the 2027 morning peak by comparing their performance without the tunnel and with the tunnel. The percentage indicates the **extra traffic delay** that results from the tunnels:

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8 June 2019

I object to the Beaches Link EIS because:

1. The environmental impacts (including pollution, loss of wildlife corridor and hearing loss) during and after construction are very severe and underestimated in the proposal. The preliminary assessments of contamination are superficial-  
for instance:

The WHT proceeded to approval with only a preliminary assessment of contamination being completed. This is problematic as many aspects of the project such as waste removal and remediation cannot be planned for without a detailed assessment. The BLT EIS has also not included any detailed assessment, but this is unfortunately not expected to be a barrier to approval given the approval of the WHT without one.

Instead, the Department of Planning Industry and Environment (DPIE) imposed Conditions of Approval (COA) on the WHT which required a Detailed Site Investigation (DSI) to be undertaken, before construction starts, where a site has been identified in the EIS as being at moderate to high risk of being contaminated. The DSI, which should contain the more detailed contamination assessment, is supposed to be placed on the TfNSW website, before construction starts. There is no requirement that the DSI report remain on the website for a specified time before work commences to enable it to be considered by residents, other stakeholders or regulators such as the EPA, which is itself problematic.

Construction began at the Ridge Street site, within St Leonard's Park, without the DSI report being prepared and published. Standard contamination management measures required by the COA, such as dust screens and run-off controls also appear not to have been implemented, despite the proximity of the site to a pre-school.

Of the three DSI reports prepared to date - Ridge Street, North Sydney, Rosalind Street, Cammeray and Arthur Street, North Sydney – the first two involve a site carved out of a park and one in close proximity to a school, respectively. They do not adequately protect school children, and other sensitive users, as they:

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- assess contaminants according to generic industrial/commercial health-based investigation levels rather than the more rigorous recreational/residential levels.

There would be exceedances of benzo(a)pyrene at all sites and lead at Arthur Street if samples at the sites are assessed against recreational/residential levels. • in Rosalind Street asbestos and polycyclic aromatic hydrocarbons reported in the WHT EIS have been ignored, on the basis that it couldn't be confirmed that the samples referred to in the EIS showing the presence of those contaminants were taken within the site.

The Ridge Street issues were reported to the DPIE, on 9 April but no enforcement action has been taken. The recently published Rosalind St and Arthur St DSIs have also been reported to the DPIE for investigation.

The failure to effectively manage contamination risks directly impacts resident's access to recreation due to identified threats including to Bicentennial Park and Flat Rock Gully from disturbance of a former tip site; and to Middle Harbour (including the learn-to swim site at Clive Park) and Northbridge Baths from disturbance of contaminated sediment.

2. The social impacts (including increased road hazards, increased travelling distance and travelling time for residents along the proposed project during and after construction have been underestimated. And in some cases, the areas of impact have been politically excluded from consideration.

3. The economic benefits appear to be based on models using outdated data, including very outdated population projections, (with the more recent Australian Government forecasts predicting a 4% decrease in population) and new norm- work from home considerations and have been “guided by elimination of factors to consider”.

For instance- The WHT EIS does not assess the impact of the B-line buses on congestion on the Harbour Bridge and Military Road. Nor does it take account of the possible impact of a rapid and frequent public transport link between the identified growth area around Frenchs Forest and Chatswood when combined with the metro to the city to be completed in 2024. The metro will have an estimated Chatswood to Barangaroo trip time of 9 minutes (11 minutes to Martin Place) and a departure every 4 minutes.

And

No mention is made of Census journey to work data showing that 52.1% of Northern Beaches residents work in their own Local Government Area (LGA) and 65% of the remainder work in either the City of Sydney, North Sydney, Willoughby or Ryde LGAs. Given that the EIS refers to the Military Road/Spit Road and Warringah Road/Eastern Valley Way corridors generally operating over capacity during peak periods but not at other times, journey to work data becomes particularly relevant.

The BLT EIS shows that the Warringah Road corridor is both busier and more congested than the Spit/Military Road corridor while being less used by public transport, reinforcing the need to consider public transport alternatives utilising this corridor.

Hence these three components of any triple bottom line modelling have each been miscalculated- leading to the classic “UNWARRANTED ESCALATION OF COMMITMENT” .(do a google search on Unwarranted escalation of commitment and you will find many examples of how the proposed project mirrors previous failures).

As a resident of the impacted area, and as a (now retired) Professor of Business specialising in strategic management and quality assurance, I am quite familiar of how interest groups can tie the hands of professional staff by having politicians restrict the scope of what is to be included and what is to be excluded in modelling triple bottom line considerations of large projects. In this case, it appears that an underlying purpose of the planned highway project was justified on population growth estimates encouraging large scale commercial traffic and commuter traffic to serve Northern Beach development- Little consideration of changes possible through public transport networks- is given. Nor major shifts in working patterns, nor impact on wildlife. Rather- since other major tunnels/roads have been approved- this is the next “logical” extension”-EVEN though the extension cannot be justified as proposed against up- to -date modelling that considers changes in population, road use, and broader (and localised) social and environmental costs.

I would recommend that the project not go ahead without freeing the hands of the professional staff to use new data to re-evaluate the economic, social and environmental impact modelling against alternatives.



**Dear members of the Public Works Committee,**

Thank you for the opportunity to submit to an inquiry on this matter. It fills me with hope that the Committee is inviting everyday people like me to submit their concerns. I am indeed very concerned about these projects and completely object to the Western Harbour Tunnel (including the Warringah Freeway Upgrade) and Beaches Link (including the Gore Hill extension) projects. I detail some of my concerns with regards to the Terms of Reference below. But in brief, I urge you to recommend that the NSW Government abandon plans for these projects immediately.

To give you some context of why this matters so much to me: I have lived on Sydney's North Shore since moving to Australia just over ten years ago. There was never a doubt for me that it is one of the most beautiful areas of Sydney. My family and I love the outdoors and cherish many of the areas that would be negatively impacted by these projects – both during construction, but quite possibly long-term due to contamination - in particular the Northbridge Baths, Bicentennial Reserve, Cammeray Park and Flat Rock Gully.

Since the beginning of the Covid-19 pandemic last year our use of these recreational areas has only increased – and given working-from-home arrangements are continuing for us and many friends, I can't see an end to the need for locally accessible recreational spaces like these. Yet, the project paints a polluted picture for these spaces. My husband suffers from asthma and I fear he'd be unable to further enjoy and use these places. Surely the intention of a transport project isn't to make local residents like us need to drive elsewhere for recreation?

On the topic of transport, I can't see how these projects support an advancement to more efficient transport. Instead, they seem to undermine efforts to strengthen public transport by supporting car-based options. Solving congestion cannot be achieved by building more roads. And these projects specifically do nothing to ease local traffic or local pollution (apart from making them worse).

How billions of dollars are spent – or rather wasted – on such detrimental projects without comprehensively considering and comparing alternative (public transport) options and conducting a comprehensive Environmental Impact Statement that addresses details of how contamination, noise and other impacts on residents is managed, is irresponsible. It is not the kind of city I want my family to live in.

To respond to the inquiry's terms of reference:

**(a) the adequacy of the business case for the project, including the cost benefits ratio**

No business case has been released, so it is impossible to judge.

**(b) the adequacy of the consideration of alternative options**

Alternatives considered in the WHT and BLT Environmental Impact Statements were only motorway tunnels in different alignments. There was a cursory reference to public transport alternatives. Congestion pricing was not considered at all.

Despite the scale of the projects, the contamination risks and the construction impacts, the Environmental Impact Statements give no serious consideration to alternatives such as the B-line busses or other public transport - especially when combined with the Metro to the City to be completed in 2024.

Of particular concern are statements in the EIS for the BLT (page 3.2) as to the impact of COVID-19 on future traffic volumes on relevant routes, by stating that traffic has returned to pre-COVID levels without considering the substantial but temporary decline in public transport patronage. Appropriate modelling will need to take into consideration a resumed increase in public transport usage.

**(g) 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**

The projects have proceeded on the basis that COVID-19 will have no impact on the traffic volumes on which the projects' benefits are predicated. However, reduced population growth and a greater degree of continued working from home arrangement are likely to lead to less car-based traffic in the future.

- The Sydney Morning Herald of 20 April 2021 quotes the NSW Chief Economist, Stephen Walters: We are not coming in 100 per cent five days a week and so the reality is the demand for office space is not going to be what it used to be.
- The Australian Government Centre for Population website states: The impact of COVID-19 is expected to be long lasting. Australia's population is expected to be smaller and older than projected prior to the onset of the pandemic. Australia's population is estimated to be around 4 per cent smaller (1.1 million fewer people) by 30 June 2031 than it would have been in the absence of COVID19. The population will also be older as a result of reduced net overseas migration and fewer births. Despite COVID-19, Australia's population is still growing and is expected to reach 28 million during 2028–29, three years later than estimated in the absence of COVID-19. COVID-19 is projected to slow population growth across all geographic areas, with the duration and magnitude linked to the importance of net overseas migration to different parts of the country. Capital cities are projected to bear the heaviest impacts, with total population across capital cities estimated to be around 5 per cent lower by 30 June 2031 than in the absence of COVID-19. By contrast, population outside the capital cities is estimated to be around 2 per cent smaller than it would otherwise have been.

**(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body**

No business case has been published thus failing to meet the levels of transparency and accountability which taxpayers like myself are entitled to expect. Equally, the Environmental Impact Statements fail to include relevant matters such as the consideration of public transport alternatives.

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

It is of great concern that the WHT proceeded to approval with only a preliminary assessment of contamination being completed. This sets a dangerous precedent for the BLT whose Environmental Impact Statement also doesn't include detailed assessments required to plan and cost waste removal and remediation. Contamination risks are significant: Disturbance of a former tip site at Flat Rock Gully and contaminated sediment at Northbridge Baths to mention two of them. This effectively risks resident's access and use of those places for recreation.

It is also unclear how air quality from unfiltered stacks will be managed ongoing.

**(m) any other related matter**

Given the detrimental impacts of these projects described above I question how they are justified to be the best use of funds?

Thank you again for the opportunity to make this submission.

## Submission to the Parliamentary Inquiry into the Tunnels project

To whom it may concern

My family and I are residents of Cammeray and have lived in this suburb and community for 20 years. This area is an absolute gem being close to the city but with a village and close knit community feeling.

When the tunnels project was initially raised by the NSW Government a few years ago, many hundreds in our community including planning, environment and engineering experts were concerned and raised issues with the approach and scope of this project but it has fallen on deaf ears.

I would like to submit that this project does not have merit on several grounds:

- The business case has not been released, so it is not possible to judge when important information such as design options (alignments, portal positions) has not been provided. Where is the transparency for such a large and costly undertaking?
- Alternative “options” only considered motorway tunnels in different alignments - not alternative transport options - do we really want more cars on our roads and tunnels spewing fossil fuels and destroy our environment - anyone heard of climate change?
- Consultation documentation is full of misleading language and diagrams - (e.g., “Freeway Upgrade” terminology used instead of “Motorway Expansion”; traffic modelling refers to “Do nothing & do something” rather than “without project & with project”. Environmental Impacts Assessment fails to present the impacts; for example the Motorway facility sheds are only shown in distant views and camouflaged green
- Permanent loss of 2.8 Ha of community green space equivalent to four soccer fields in Cammeray Park will become motorway sheds and exhaust pumping station. The attachment is an aerial photo showing the considerable area of Cammeray Park affected. Transport NSW ignored requests during the consultation period to mark out the area of parkland lost or erect height poles to indicate the position and scale of the proposed sheds.
- Double exhaust stacks at Ernest Street Bridge (to expel pollution from BOTH Harbour & Beaches Tunnel) 250m from ANZAC Primary School
- Flat Rock Creek Gully construction site (Next to Willoughby Leisure Centre) will disturb old rubbish tip and additionally expel waste into the creek to Tunks Park and Middle Harbour
- Heavy truck movements for tunnel excavation along Brook Street and Flat Rock Creek Drive

- Health and safety risks associated with the construction and operation of the tunnel are higher than alternative due the current alignment and proximity to so many schools. Heavier traffic in local streets will make crossing more difficult, especially for kids and the elderly in Cammeray, Neutral Bay and North Sydney.

The traffic in Cammeray and surrounding suburbs is already heavy with many new families living in this area. Saturday mornings is basically a gridlock - it will be nigh impossible to when this project starts.

Its about time the community is heard fully on these issues instead of just barrelling ahead on such a project with its disastrous impacts on locals and the environment - we will have to live with this for several years with cost and time blowouts which I have no doubt about. The decision makers of today will be long gone on their pensions and the community will be left suffering just like the communities impacted by WestConnex.

Thank you for your consideration.

**Submission to the Inquiry into the impact of the Western Harbour Tunnel and Beaches Link**

**TERMS OF REFERENCE**

That the Public Works Committee inquire into and report on the impact of the Western Harbour Tunnel and Beaches Link Project, including each of its constituent parts being the Warringah freeway upgrade, the Western Harbour Tunnel and the Beaches Link, including:

**(a) the adequacy of the business case for the project, including the cost benefits ratio,**

A sufficient business case has not been released, so it is not possible to judge.

**(b) the adequacy of the consideration of alternative options,**

The only alternatives considered in the WHT and BLT Environmental Impact Statements (EISs) were motorway tunnels in different alignments, and a cursory reference to public transport alternatives. Congestion pricing was not considered at all. Despite the environmental impacts, the contamination risks and the construction impacts, the EISs give no serious consideration to alternatives.

**Public Transport**

The WHT EIS does not assess the impact of the B-line buses on congestion on the Harbour Bridge and Military Road. Nor does it take account of the possible impact of a rapid and frequent public transport link between the identified growth area around Frenchs Forest and Chatswood when combined with the metro to the city to be completed in 2024. The metro will have an estimated Chatswood to Barangaroo trip time of 9 minutes (11 minutes to Martin Place) and a departure every 4 minutes.

The BLT EIS mentions the planned rapid bus service from Dee Why to Chatswood operating in conjunction with the new metro but blithely dismisses its potential impact with: While these projects would contribute to reducing congestion... they would not be sufficient to resolve the existing road network capacity constraints between the lower North Shore and the Northern Beaches. This is due to the complexity of journey patterns and trip purposes within Greater Sydney and the dispersed nature of origin and destination points for an individual journey.

No mention is made of Census journey to work data showing that 52.1% of Northern Beaches residents work in their own Local Government Area (LGA) and 65% of the remainder work in either the City of Sydney, North Sydney, Willoughby or Ryde LGAs. Given that the EIS refers to the Military Road/Spit Road and Warringah Road/Eastern Valley Way corridors generally operating over capacity during peak periods but not at other times, journey to work data becomes particularly relevant.

The BLT EIS shows that the Warringah Road corridor is both busier and more congested than the Spit/Military Road corridor while being less used by public transport, reinforcing the need to consider public transport alternatives utilising this corridor.

There is no question of capacity constraints with the BLT EIS stating that the metro will provide a capacity increase of 100,000 passengers an hour.

**(c) the cost of the project, including the reasons for overruns,**

No comment

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

No comment

**(e) the extent to which the project is meeting the original goals of the project,**

No comment

**(f) the consultation methods and effectiveness, both with affected communities and stakeholders,**

Both the WHT and BLT EISs were released at Christmas, when public focus is distracted, and were then open for comment across a month or more of school holiday breaks when schools were closed (and Parents & Citizens Association not convened) and parents across the area preoccupied with caring for children. The difficulty of this timing for the community was exacerbated by the restrictions imposed by the COVID19 pandemic on meetings, community gatherings, libraries and access to computing equipment

**(g) 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,**

The projects have proceeded on the basis that COVID-19 will have no impact on the traffic volumes on which the projects' benefits are predicated whereas evidence suggests that COVID-19 will lead to lower traffic volumes than those predicted.

As opposed to the statement in the BLT EIS, the evidence suggests that COVID-19 is likely to result in lower traffic levels than predicted due to reduced population growth and a greater degree of working from home.

For instance, Infrastructure Australia's December 2020 report Infrastructure beyond Covid-19 states: A 2020 Gartner CFO survey reports that 74% (CFOs) expect a shift whereby some employees remote work permanently, indicating significant uncertainty for CBDs following COVID-19.

In similar vein, The Sydney Morning Herald of 20 April 2021 quotes the NSW Chief Economist, Stephen Walters: We are not coming in 100 per cent five days a week and so the reality is the demand for office space is not going to be what it used to be.

As regards population growth, the Australian Government Centre for Population website states: The impact of COVID-19 is expected to be long lasting.

Australia's population is expected to be smaller and older than projected prior to the onset of the pandemic. Australia's population is estimated to be around 4 per cent smaller (1.1 million fewer people) by 30 June 2031 than it would have been in the absence of COVID-19. The population will also be older as a result of reduced net overseas migration and fewer births. Despite COVID-19, Australia's population is still growing and is expected to reach 28 million during 2028–29, three years later than estimated in the absence of COVID-19.

COVID-19 is projected to slow population growth across all geographic areas, with the duration and magnitude linked to the importance of net overseas migration to different parts of the country.

Capital cities are projected to bear the heaviest impacts, with total population across capital cities estimated to be around 5 per cent lower by 30 June 2031 than in the absence of COVID-19. By contrast, population outside the capital cities is estimated to be around 2 per cent smaller than it would otherwise have been.

**(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts,**

**(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body,**

The failure to publish the business case, and the failure of the EISs to include relevant matters means that the projects fail to meet the levels of transparency and accountability which taxpayers are entitled to expect.

The failure to consider and compare alternatives becomes of particular concern given the failure to release the business cases justifying the projects.

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

Objections related to the proposed Flat Rock Gully tunnelling site, Tunks Park and Middle Harbour environment (off Northbridge):

- Objection: dust and pollution from the tunnelling dive site operating 24/7 at Flat Rock Gully. The dive site is an historical tip and there is contaminated soil and sandstone including dust taken out by over 500 trucks each day that could become airborne. We want to make sure that children are not breathing these particles. This site will be operating for 5 years. Mitigation: ◇real time/alert style air quality monitors be installed at Willoughby

Leisure Centre where many children play sport.

- **Objection:** dredging at Middle Harbour off Clive Point. There are high level contamination of lead and zinc just under the sea bed, these will be exposed during the dredging for the immersed twin tunnels and the construction of the coffer dams. **Mitigation:** silt curtains to go all the way to the sea bed, rather than just part way and continuous water quality testing for contaminants around Northbridge Baths and the Northbridge Sailing Club.
- **Objection/mitigation:** more testing to be undertaken to determine the extent of contamination at the tip site and take appropriate action depending on the contaminants.
- **Objection/mitigation:** contaminated soil from the tunnelling site not be stored or retained onsite at Flat Rock Gully (which we believe is the plan at this time). If it is contaminated it needs to be removed from the site so that it doesn't become airborne or leach into the soil and into Flat Rock Creek.
- **Objection/mitigation:** bushland will be removed for the construction of the acoustic sheds in Flat Rock Gully. However there is no guarantee this will be returned to bushland. Given the EIS states that temporary rather than permanent loss of bushland is required during the tunnel's construction phase, then permanent loss of bushland should not be considered as part of the EIS - i.e. that option should be removed from the EIS. Authority to determine whether a portion of bushland reserve is permanently lost should not be delegated to local Council, as that decision impacts the broader community and future generations, not just Willoughby 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.
- **Objection:** heavy trucks carrying spoil entering and exiting Flat Rock Drive from 7am to 7pm causing disruption to traffic flow and increased traffic on Sailors Bay Road as a result.
- **Objection:** other areas of concern are excessive construction noise and vibration to local residents.

#### Biodiversity Concerns and Objections:

- The Beaches Link will negatively impact significant wildlife corridors, including Flat Rock Drive and Manly Dam bushland, and marine ecosystems at Middle Harbour and the Spit.
- The proposed project counteracts the principles of Ecologically Sustainable Development in the Protection of the Environment Administration Act 1991 (NSW) which declares that the conservation of biological diversity and ecological integrity should be of fundamental consideration (PEAA Act Part 3(2)(c)).
- 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 supports a wide range of small birds, mammals, reptiles and frogs that are disappearing



from our urban areas.

- Flat Rock Gully is a key part of the network of wildlife corridors across Sydney required to maintain biodiversity - around 6.77 hectares (over 16 acres) of bushland will be flattened for the construction footprint (EIS Chapt. 19, p.19.9) at Flat Rock Gully.
- 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 then overridden by the NSW State Government
- The bushland at Flat Rock Gully has been targeted for destruction on the basis that it is 'only' regenerated bush. This regeneration is the result of 25 years of work by WCC and bush care volunteers. The plantings were all propagated from local indigenous plants. Wildlife doesn't discriminate between regenerated and remnant indigenous trees and bushland
- Biodiversity is poorly scoped in the EIS. The bulk of the biodiversity assessment concentrates and comments on 23 threatened species only. It side-steps the many hundreds of species which will lose their habitat, be driven away or bulldozed under including a wide range of bird species, frogs, reptiles, mammals and aquatic animals.
- A full study of wildlife has not been carried out in Flat Rock Gully, Middle Harbour and nearby bushland. Desktop assessments and a few walk-throughs are inadequate to reveal its full biodiversity
- The use of the controversial biodiversity offsetting policy to allow for the destruction of biodiverse bushland in urban communities. This policy, which allows for destruction of biodiversity in one area as long as it is protected somewhere else in NSW, is a recipe for local extinction.
- The EIS acknowledges that animals and birds on the construction footprint and nearby bush reserves will be driven away, in some cases permanently, by loss of habitat, food and breeding sites and by the noise, lights, vibration and traffic yet there are few well-developed mitigation plans for the variety of species which will be impacted. (EIS p.19-64).
- The proposed mitigation measures to protect wildlife during construction are weak. Checking that no animals are in the way 24 hours before construction or having people 'spot' them from barges and remove them during construction seems doomed to failure as it will not be the main focus or within the expertise of most constructors
- The health of local creeks, waterways and the marine environments are at risk from scouring, elevated salinity, siltation, contamination by disturbed toxic materials from the tip site and accidental fuel or chemical spills. Groundwater drawdown may contribute to trees becoming stressed or dying in other parts of Flat Rock Gully away from the construction

footprint.

- The EIS is inconclusive on the future of the destroyed site which is 10% of the Flat Rock Reserve. Decision-making about its future should not be left to the end of the construction process. The EIS should confirm its rehabilitation and return to bushland.

Requested changes:

- Carry out full assessment of biodiversity in and around the area to be destroyed in Flat Rock Gully. Check trees for hollows across the gully area. Carry out fish and macroinvertebrate sampling in creeks and waterways.
- In consultation with wildlife experts, develop a full suite of mitigation measures to protect the wildlife in local bushland from noise, light and traffic in Flat Rock Gully.
- Undertake full bush regeneration. Undertake three for one tree planting as required by the local vegetation strategy.
- 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).
- Engage consultant (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.
- Include clear strategies in the EIS to counteract the release of contaminants into Middle Harbour following storms or due to silt curtain damage.
- If the proposal is approved it is vital that, at the end of the project, the construction site in Flat Rock Gully is restored to bushland consistent with the Environmental Conservation zoning of the site and in accordance with the local Urban Bushland Plan of Management and the Flat Rock Gully Reserve Action Plan.

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

Processes for responding to threats to residents from contamination have shown themselves to be inadequate. Processes for responding to threats to residents from vibration have, from West Connex experience, also shown themselves to be inadequate.

The lack of compliance with and enforcement of Conditions of Approval (COAs) applying to the WHT demonstrate that the processes aren't working.

**Failure to protect against risks from contamination**

The WHT proceeded to approval with only a preliminary assessment of contamination being completed. This is problematic as many aspects of the project such as waste removal and

remediation cannot be planned for without a detailed assessment. The BLT EIS has also not included any detailed assessment, but this is unfortunately not expected to be a barrier to approval given the approval of the WHT without one.

Instead, the Department of Planning Industry and Environment (DPIE) imposed Conditions of Approval (COA) on the WHT which required a Detailed Site Investigation (DSI) to be undertaken, before construction starts, where a site has been identified in the EIS as being at moderate to high risk of being contaminated.

The DSI, which should contain the more detailed contamination assessment, is supposed to be placed on the TfNSW website, before construction starts. There is no requirement that the DSI report remain on the website for a specified time before work commences to enable it to be considered by residents, other stakeholders or regulators such as the EPA, which is itself problematic.

**(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths, and**

The impact of the projects on nearby public sites includes the permanent loss of 2.8 hectares of community green space, equivalent to four soccer fields, in Cammeray Park; and the impact on areas such as Bicentennial Reserve, Flat Rock Gully, Northbridge Baths and Clive Park mentioned above.

The BLT also poses contamination risks to Tunks Park which is at risk from contamination emanating from the old tip site in Flat Rock Gully, as notified to the EPA by Willoughby Council in February 2021 pursuant to section 60 of the Contaminated Land Management Act.1979.

**(m) any other related matter.**

Requests

- Carry out full assessment of biodiversity in and around the area to be destroyed in Flat Rock Gully. Check trees for hollows across the gully area. Carry out fish and macroinvertebrate sampling in creeks and waterways.
- In consultation with wildlife experts, develop a full suite of mitigation measures to protect the wildlife in local bushland from noise, light and traffic in Flat Rock Gully.
- Undertake full bush regeneration. Undertake three for one tree planting as required by the local vegetation strategy.
- 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).

- Engage consultant (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.
- Include clear strategies in the EIS to counteract the release of contaminants into Middle Harbour following storms or due to silt curtain damage.
- If the proposal is approved it is vital that, at the end of the project, the construction site in Flat Rock Gully is restored to bushland consistent with the Environmental Conservation zoning of the site and in accordance with the local Urban Bushland Plan of Management and the Flat Rock Gully Reserve Action Plan.

Thank you,  
Northbridge Public School P&C Association

I object to the Tunnel with Beaches Link EIS because:

1. The environmental impacts (including pollution, loss of wildlife corridor during and after construction are very severe and underestimated in the proposal.

The preliminary assessments of contamination are superficial-  
for instance:

The WHT proceeded to approval with only a preliminary assessment of contamination being completed. This is problematic as many aspects of the project such as waste removal and remediation cannot be planned for without a detailed assessment. The BLT EIS has not included any detailed assessment, but this is unfortunately not expected to be a barrier to approval given the approval of the WHT without one.

Construction began at the Ridge Street site, within St Leonard's Park, without the DSI report being prepared and published. Standard contamination management measures required by the COA, such as dust screens and run-off controls also appear not to have been implemented, despite the proximity of the site to a pre-school.

Of the three DSI reports prepared to date - Ridge Street, North Sydney, Rosalind Street, Cammeray and Arthur Street, North Sydney – the first two involve a site carved out of a park and one in close proximity to a school, respectively. They do not adequately protect school children, and other sensitive users, as they:

- do not consider impacts, and transmission pathways, off-site as required by the COA
- assess contaminants according to generic industrial/commercial health-based investigation levels rather than the more rigorous recreational/residential levels.

There would be exceedances of benzo(a)pyrene at all sites and lead at Arthur Street if samples at the sites are assessed against recreational/residential levels. • in Rosalind Street asbestos and polycyclic aromatic hydrocarbons reported in the WHT EIS have been ignored, on the basis that it couldn't be confirmed that the samples referred to in the EIS showing the presence of those contaminants were taken within the site.

The Ridge Street issues were reported to the DPIE, on 9 April but no enforcement action has been taken. The recently published Rosalind St and Arthur St DSIs have also been reported to the DPIE for investigation.

The failure to effectively manage contamination risks directly impacts resident's access to recreation due to identified threats including to Bicentennial Park and Flat Rock Gully from disturbance of a former tip site; and to Middle Harbour (including the learn-to swim site at Clive Park) and Northbridge Baths from disturbance of contaminated sediment.

2. The negative social impacts include increased road hazards with heavy trucks using already congested roads 24/7, increased travelling distance, travelling time and traffic congestion during and probably after construction will increase the air pollution

3. The economic benefits appear to be based on models using outdated data, including very outdated population projections, (with the more recent Australian Government forecasts predicting a 4% decrease in population) and new norm- work from home considerations and have been “guided by elimination of factors to consider” including.

The actual and potential impacts of public transport improvements including the B-line buses and a rapid and frequent public transport link between the identified growth area around Frenchs Forest and Chatswood when combined with the metro to the city to be completed in 2024.

In fact the tunnels are not designed for public transport which would significantly reduce the current single vehicle traffic congestion across

And

No mention is made of Census journey to work data showing that 52.1% of Northern Beaches residents work in their own Local Government Area (LGA)

The BLT EIS shows that the Warringah Road corridor is both busier and more congested than the Spit/Military Road corridor while being less used by public transport, reinforcing the need to consider public transport alternatives utilising this corridor.

Hence these three components of any triple bottom line modelling have each been miscalculated- leading to the classic “unwarranted escalation of commitment”.

As a resident of the impacted area, I am appalled at the evidence of politicians restricting the scope of what is to be included and what is to be excluded in modelling triple bottom line considerations of large projects. In this case, it appears that an underlying purpose of the planned highway project was justified on population growth estimates encouraging large scale commercial traffic and commuter traffic to serve Northern Beaches development. Little consideration is given to changes possible through high speed and efficient public transport networks that are not purely focused upon transit into the City of Sydney. Nor to major shifts in working patterns, nor impact on wildlife. Rather- since other major tunnels/roads have been approved- this is the next “logical” extension”-EVEN though the extension cannot be justified as proposed against up- to -date modelling that considers changes in population, road use, and broader (and localised) social and environmental costs.

I would recommend that the project not go until new data is used to re-evaluate the economic, social and environmental impact modelling and consider alternatives to building yet more roads and tunnels.