

**Public Works Committee Inquiry into the impact of the Western Harbour Tunnel and
Beaches Link Hearing 13 September 2021**

Supplementary questions

Note: Given Council meeting schedules and the deadlines imposed by the Public Works Committee Inquiry, this document was unable to be referred to Council for its endorsement and therefore remains the unendorsed response to the Committee's questions prepared by North Sydney Council officers.

- 1. What have you done to ensure that contamination concerns of the community around local construction sites have been addressed?**
 - a. Have you reported the contamination to the EPA and what has their response been?**
 - b. Has the community been notified of the potential contamination risks?**

Major project construction sites are the domain of the Environmental Protection Authority and Council has no formal role in this apart from forwarding any potential complaints including contamination issues. Council has forwarded complaints as they have arisen.

- 2. Is it the view of North Sydney's traffic planners that Military Rd traffic will likely worsen as a result of the project? a. Can you explain why and what you think the traffic predictions will be?**

Military Rd traffic will unlikely worsen as a result of the project. However, neither will it get any better. It is considered that "not making things worse" is a very low bar set for public spending of in the order of (est.) \$25-30B.

Beaches Link EIS modelling suggests that Military Road traffic volumes will fall to 85% of 2016 levels by 2036. It is unclear from EIS modelling what level of toll will be applied to Beaches Link in order to achieve this level of traffic reassignment from Military Road to Beaches or to what extent induced traffic demand on Military Road undermines Military Road to Beaches Link traffic reassignment. A 15% reduction in traffic does not allow for significant road space or phase time reallocation on Military Road. This means that there is limited opportunity to deliver public domain, walking, cycling, public transport or local traffic improvements as a result of the Beaches Link project. Given that the primary determinate of traffic volume is link capacity, it is expected that Military Road traffic volumes will return to pre-project levels soon after the 2036 modelling timeframe chosen by the proponent unless reduced Military Road traffic capacity is "locked in" as part of a clearly defined and funded "local benefits program".

- 3. Is it your understanding that all arteries leading out from the Warringah Freeway will experience greater delays as a result of the project?**

No. Increased traffic and delays will be location/link specific and dependent on whether the link provides direct access to new motorways infrastructure. According to the Western Harbour Tunnel EIS modelling, Miller Street delays, between Falcon Street and Berry Street, increase by approximately 200-300% by 2036 whereas Military Road traffic volumes fall by 15%. It is expected that traffic volumes will increase to meet network/link capacity shortly after the modelling timeframes chosen by the proponent.

Also, some of the forecast traffic increases/delays in the EIS modelling (pre- and post-project scenarios) are based on the erroneous assumption (used in EIS modelling) that traffic volumes continue to increase over time irrespective of the capacity of existing infrastructure to accommodate these increases. In the words of Supreme Court Judge David Kirby, Commissioner of the Warringah Transport Corridor Enquiry (1983), who recommended not proceeding with the Northern Beaches motorway proposal of the 1980s:

When traffic flow passes tolerable constraints, motorists (particularly those driving by choice rather than necessity) turn to options such as alternative routes, public transport, or even other lifestyles.

4. Can you please provide more information about the likely air quality impacts to the local area and particularly to schools? a. If local traffic implications are unknown or worsen, is it likely that air pollution in the local area will also be worse?

(Response to Q4 and 7) The EIS for the Western Harbour Tunnel and Warringah Freeway upgrade has concluded that there would be no risks to the local community including the school and residential broader community.

Council's submission in relation to air quality had raised points of clarification based around increased concentrations of air quality parameters as a result of increased traffic generation both for the ventilation stacks and surface road traffic. Council submitted the following suggested mitigation measures:

- Sensitivity tests should be performed for the surface roads which could have a much greater impact on the predicted concentrations at sensitive receptors.
- Consideration should be given to referencing the revised NO₂ standard that are proposed in the National Environment Protection Measure (Ambient Air Quality) and applying those revised standards to the project and reassessing the potential impact of the proposal.
- Consider the limitations in the assessment of odour impacts from traffic and reassess proposal.
- Consider the limitations in the metrological modelling and reassess proposal.
- Implement real time dust monitoring programs for construction sites and other high risk areas including the provision of localized air quality management plans.
- Assess and consider mitigation measures near surface roads such as barriers, setbacks, gradient, vegetative barriers, etc.

In light of the above listed uncertainties, Council considered it would be prudent to require the proponent to install filtration on the ventilation stacks to lessen the air quality impacts on the community.

Council also had concerns with the air quality modelling, specifically the lack of any local air quality monitoring station from which to draw accurate baseline air quality parameter concentrations. To this end, Council employed the services of an air quality consultant and gathered baseline air quality data for a twelve month period from March 2020 to March 2021.

5. Has North Sydney Council looked into the Climate and Sustainability profile of the projects and do you have any concerns?

North Sydney Council officers have the following concerns in relation to the project's Climate and Sustainability profile as outlined in the EIS:

Electricity use:

The indicative temporary power requirements of the construction support sites are very high (4-8.5 MVA). More concerningly, as per p24-15 of the EIS: "The anticipated operational electricity consumption of the project would be about 32 MVA". Given the current climate emergency, North Sydney Council urges the NSW government to ensure that the project is powered by 100% renewable energy, including onsite generation at the construction sites and particularly that it is integrated into the ongoing operation of the resulting infrastructure project itself.

Appendix X of the EIS lists "Opportunities to install solar panels at the tunnel portals and on tunnel support and traffic control facility buildings to supplement non-renewable power sources where feasible and reasonable" as a measure to minimise energy consumption. As per the above, North Sydney Council strongly urges the NSW government to strengthen this position to ensure that every opportunity is taken to install solar PV to reduce the off site energy generation requirements of the site.

Sustainability (Chapter 25):

Table 25-4 Indicative sustainability objectives and target themes

Minimise energy use and greenhouse gas emissions:

Rather than limiting the target theme to energy efficient lighting we suggest this is broadened to "energy efficiency" of the entire project and that "renewable energy" is added as a target theme.

Optimise resource efficiency and waste management:

Given the current waste and recycling crisis, the state mandate to support a circular economy, and the federal 80% average resource recovery target by 2030, rather than limiting recycled content to road base we suggest "Recycled content, including in road base" as alternate wording in the target theme.

Efficiently manage water:

To ensure the Cammeray stormwater reuse scheme, or equivalent, remains operational through and after construction, we strongly advocate for the addition of "Retain existing non-potable water capture, treatment and supply" in the target theme.

Maximise sustainable procurement:

To truly maximise sustainable procurement, "Recycled content" and "Australian made" should be added as target themes.

Table 25-5 Application of the principles of ecologically sustainable development to the project

"Contribution to improving the capacity, functionality and safety of Sydney's transport network for motorists, buses and freight" - There should also be significant benefits to pedestrians, cyclists and other no/low carbon forms of transport. What are they? Eg: this project could and should be utilised to also improve cycle access to the city via the Sydney Harbour Bridge, such as by removing a vehicle lane.

"Reduction of operational greenhouse gas emissions on Sydney's road network when compared to the project not being built" - Where is the evidence for this? And how does this compare to other transport options (see our response to Q5a below).

"About seven hectares of vegetation would be removed however no vegetation consistent with any plant community types or threatened ecological communities would be impacted". This statement ignores its value as habitat for insects, birds and other animals as an impermeable surface.

"Impacts to marine habitats would not be significant and would recover quickly through natural processes". There does not seem to be any evidence documented in the EIS to support this.

"The management plan will detail measures to meet the sustainability objectives and targets as well as achieving 'Design' and 'As Built' ratings of Excellent under the Infrastructure Sustainability Council of Australia rating scheme." - A project of this scale and nature should strive for a "Leading" rating. Version 2 of the ISCA rating scheme rates the point scores attributed to the former "Excellent" certification as average or below.

Climate change risk and greenhouse gas (Chapter 26):

Risk 46 "The exacerbation of flooding (inclusive of climate change projections) in floodrisk areas surrounding the project as a result of the construction of new built form related to the project". - The final rating of this risk is unchanged at "medium". In rare events, this could lead to critical consequences. More measures should be put in place to reduce this risk further.

Council cannot comment on the estimated greenhouse gas emissions by source for construction that should be presented in Figure 26-1 and this figure is missing from the document. As the construction stage makes up 50% of emissions, it would be useful to have this information available to allow the community to comment. Failing this, Council recommends that every opportunity is taken to reduce the emissions of construction. Errors like this cast doubt on the accuracy of the rest of the document and its analysis.

Given the current climate emergency, Environmental Management Measure GHG2 in Table 26-7 should be strengthened so that design allowances are made to enable energy efficient systems to be installed as a minimum standard rather than "where reasonable and practicable".

Appendix X

As identified in Table 3-5, there will be significant total diesel fuel consumption by the Cutter suction dredge, Backhoe dredger and the Trailing suction hopper dredge. Council encourages the project to explore and implement further greenhouse gas efficiencies to the operation of this machinery to reduce the energy footprint of this project. Electrically operated mining & excavation equipment is now available & could be utilised to minimise toxic diesel pollution during construction given the urban & suburban locations.

As per Table 3-6, significant amounts of asphalt and ready mix concrete will be poured. As concrete has a very high embodied energy content, Council strongly encourages the project to utilize low carbon concrete. It has been proven in many projects (incl by Lend Lease at Barangaroo), particularly in marine environments. Cold asphalt and /or asphalt with a high recycled content should also be utilised. Similarly plastic fibres reduce/replace the need for reinforced steel which also has a high embodied energy content. This and similar products should be considered for application on this project.

5a. Do you think a toll road tunnel option should be compared to alternatives given the profile?

Public transport has an inherently lower impact on environmental sustainability (including greenhouse gas emissions) and local environments (such as particulate pollution and noise) than motorways designed to facilitate private vehicle use as it:

- Provides for the more efficient movement of people
- has a fraction of the environmental, and social impacts of the proposed motorways options;
- reduces the dependence of motor vehicle travel in a large and growing city, which is increasingly less sustainable on a multitude of fronts; and
- can be delivered for a fraction of the cost.

Given the significant public investment in the project, a failure to meaningfully consider other public transport options represents a fundamental shortfall in TfNSW achieving the delivery of opportunities for efficient movement of large numbers of people in a fast growing city.

While a nominal analysis of a rail option was provided in the Western Harbour Tunnel and Warringah Freeway Upgrade Environmental Impact Statement (1/2 page), no substantive transport planning was provided as the basis for this analysis.

Furthermore, with the potential for significant increases in remote working post-Covid, particularly by knowledge-based workforces that make up approximately 40% of the Northern Beaches total resident workforce, and the impact that this may have on total travel demand and mode share, a “Do Nothing” option should also be reviewed and given more serious consideration (1/2 page analysis provided in the WHT/WFU EIS).

6. Over 500 trees are scheduled to be removed for early works. What are the likely impacts to local wildlife and the community of removing those trees?

North Sydney Council has had an “Urban Forest Strategy since 2011 which is updated from time to time. North Sydney’s tree canopy has been in decline for some years and continues to be under threat of continued decline as a result of urban pressures such as development and associated infrastructure.

The loss of over 500 trees will have a negative impact on biodiversity and native fauna. The continued decline in tree numbers, canopy and associated ecosystems in North Sydney:

- Compound the heat island effect. The combination of the increased hard surfaces associated with the proposed road project, with the significant reduction in both tree canopy and soft landscaping, will exacerbate the general warming associated the heat island effect and ongoing increases in temperatures.

- Trees Store and Sequester Carbon. A healthy urban forest can store thousands of tonnes of Carbon. Additionally, as the trees grow, they sequester more carbon every year.
- Trees Play a Major Role in Stormwater Management. A typical medium-sized tree can intercept as much as 9000 litres of rainfall per year. When stormwater hits impervious surfaces in urban areas, the heat from those surfaces increases the water temperature. The stormwater also picks up various pollutants: everything from excess lawn fertilizers to oils on roadways. This translates into water-quality problems when large volumes of heated stormwater flow into receiving waters, posing a threat to temperature-sensitive species as well as providing conditions for algal blooms and nutrient imbalances.
- The character and heritage of North Sydney is very much associated with leafy, tree filled environments. The loss of 500 trees in a context of ongoing decline, is of very significant concern.

7. Do you have concerns about unacceptable levels of air pollution being imposed on residents in the hundreds of high rise buildings currently in place and planned for the area? a. Do you believe that modelling has been sufficiently considered for high rise buildings given the stack in the Northern pylon of the Harbour Bridge, a triple stack at Cammeray and an additional stack at Artarmon to add to the Lane Cove Stack?

(Response under Q5).

8. Are you seeing an increase in children living in high rise buildings in the area?

Note: the most recent data available is the 2016 ABS Census. I can't find data that specifically answers the question yes or no. Instead I can advise the following information from Council's id Profile site - [Dwelling type | North Sydney Council | Community profile \(id.com.au\)](#) and [Service age groups | North Sydney Council | Community profile \(id.com.au\)](#), when referencing the site and its content they ask that we include the following "Source: Australian Bureau of Statistics, [Census of Population and Housing](#) 2011 and 2016. Compiled and presented by [.id](#)(informed decisions)".

- In North Sydney Council area, 89.2% of the dwellings were medium or high density, compared to 44% in Greater Sydney.
In 2016, there were 3,764 separate houses in the area, 9,196 medium density dwellings, and 23,629 high density dwellings.
- Analysis of the types of dwellings in North Sydney Council area in 2016 shows that 10.2% of all dwellings were separate houses; 25.0% were medium density dwellings, and 64.2% were in high density dwellings, compared with 55.0%, 20.3%, and 23.5% in the Greater Sydney respectively.
- In North Sydney Council area, 18.0% of households were made up of couples with children in 2016, compared with 35.3% in Greater Sydney.
- Between 2011 and 2016, the number of households with children increased by 1,352 households or 21.4%.
- The largest changes in households with children in this area between 2011 and 2016 were:
 - Couples with young children (+855 households)
 - Couples with older children (+182 households)
 - Single parents with young children (+149 households)
 - Single parents with older children (+103 households)

9. Has the council been working with local schools and their P&Cs to understand their concerns and advocate for the community?

Indirectly, yes. Council invited schools to provide feedback via the following:

- Precincts - Supported to the Precinct Committees in their campaigns and public meetings, this included their liaison with local schools and P&Cs; information about the Precinct Committee campaigns etc is available at the bottom of this web page - [https://www.northsydney.nsw.gov.au/Business_Projects/Government_Projects/Western Harbour Tunnel and Beaches Link](https://www.northsydney.nsw.gov.au/Business_Projects/Government_Projects/Western_Harbour_Tunnel_and_Beaches_Link)
- Public Meeting - Invited school representatives to participate in the Public Meeting that Council held 26 July 2017, agenda attached confirming that two school representatives presented
- Letter - I recall the Mayor wrote to a Minister (or the Premier?) advocating on behalf of schools. I think there was a Council resolution prompting this, and that Wenona specifically requested to be included as they were omitted from the resolution. Maybe Louise Jones can help locate this if you can't find in ECM under the WHTBL subject
- Community Campaign - in 2020 Council resolved to conduct a community campaign to increase awareness of the impacts of the WHT and Warringah Freeway Upgrade projects despite the EIS being closed. This was widely promoted to key stakeholders. I would need to spend time specially checking outgoing correspondence to confirm, but I assume this would have been promoted at least to P&Cs.

10. Do you have any concerns about the company which completed the EIS technical reports/ risk assessment being awarded the early works contract and then going on to complete the contamination testing?

This is a matter for NSW Government probity and quality assurance processes.

11. Can you explain the nature of any contracts to which North Sydney Council is a party in relation to the project?

A. How much Crown Land has been leased or sold or is due to be leased or sold and what proportion will be returned to the community?

B. Are there any guarantees that this land will be returned and be able to be used as community land?

C. Do you have any concerns that this might not happen due to usage or contamination?

Construction compounds being installed as part of the project significantly reduce by approximately 48,187m² the community's precious and limited existing open space most obvious at the Cammeray Golf Course, St Leonards Park, Anzac Park and Alfred Street and High Street reserves.

Whilst a significant amount of the current loss of open space for the construction will be returned to the community upon completion of the projects in approximately 3 – 7 years, there is a permanent loss of open space within North Sydney associated with these road infrastructure projects of approximately 15,000m². Most of the permanent loss of open space will be from the Cammeray Golf Course resulting in a significantly smaller golf course and diminished open space facility.

Golf Course Lease with Council

The Cammeray Golf Club currently has a lease with Council for the “Greens and Tees” which expires on 31 May 2026.

A “Special Lease” that the Cammeray Golf Club had with Crown Lands for the Club House, Caretakers Cottage, Parking and access expired in June 2018.

The Golf Club currently pays Council a modest annual lease fee for the “Greens and Tees” lease and this expires on 31 May 2026. The future of this lease remains a matter of discussion between Council, the Golf Club and the NSW Government.

Council will need to be satisfied that any land that is dedicated to Council as open space, will be required to be fully remediated if formerly contaminated.

12. What are the arrangements in terms of Crown Land and what will be returned to the community?

The construction phase of the project will occupy approximately 48,000sqm of Crown Land. Of this approximately 15,000sqm of land will be permanently alienated.

The quantum and quality of land to be returned to the community is the subject of ongoing negotiations with the NSW Government.

13. Has North Sydney Council reported the contamination concerns of the community to Crown Lands or EPA? If so, what has been the response? Does the Council feel enough is being done to address risks to community?

See response to Q1.

14. Do you believe this project is a solution for Military Rd congestion? In your estimation does Military Rd corridor improve as the project currently stands or is even more investment needed as requested by Mosman Council?

No. It is unclear what Mosman Council is asking for “more investment” in. Reduced traffic volumes of ~15% (less than 1 lane of traffic on Military Road) do not allow for significant road space or phase time reallocations for the improvement of public domain, walking, cycling, public transport or local traffic outcomes on Military Road. If traffic volumes are expected to return to pre-project levels soon after the 2036 modelling timeframe chosen by the proponent, will we see another Parramatta Road scenario where the delivery of “local benefits” from road space and phase time reallocation, which were promised as part of the WestConnex project, then become dependent on further traffic impact assessment and modelling? Not “locking in” opportunities for local improvements as part of a clearly defined and funded “local benefits program” is a major oversight of both the Western Harbour Tunnel and Beaches Link projects.