



26 October 2021

Legislative Council
Parliament of New South Wales
Macquarie Street
SYDNEY NSW 2000

Attention: Public Works Committee

Dear Sir/Madam,

**RE: INQUIRY INTO THE IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK
– POST-HEARING RESPONSE TO QUESTIONS – WILLOUGHBY CITY COUNCIL**

On 13 September 2021, Councillor Gail Giles-Gidney, Mayor and Andrew Gillies, Strategic Transport Planner, appeared on behalf of Willoughby City Council (Council) to answer questions from the Public Works Committee (the Committee) regarding the impact of the Western Harbour Tunnel and Beaches Link project on the City of Willoughby. This was following a submission Council made to the Inquiry, dated 17 June 2021. Council's original submission to the Inquiry included the following:

- **Covering letter and submission** – Addressing the Terms of Reference for the Inquiry
- **Attachment 1** – Willoughby City Council – Western Harbour Tunnel and Warringah Freeway Upgrade – Submission on Environmental Impact Statement – undated (submitted March 2020)
- **Attachment 2** – Willoughby City Council – Beaches Link and Gore Hill Freeway Connection – Submission on Environmental Impact Statement – March 2021

Following the hearing of 13 September 2021, the Committee emailed Council a copy of the uncorrected transcript of the hearing, requesting any corrections, an answer to a question on notice and any additional information. In a subsequent email, a list of five several supplementary questions were sent.

Council has reviewed the part of the transcript relating to its appearance and considers it is a true and accurate record of the hearing. Council therefore has no corrections to be made. The one question on notice and five supplementary questions have been answered on the following pages.

Thank you for giving Council the opportunity to appear in the Inquiry and provide a response to these questions. You can contact Andrew Gillies, Strategic Transport Planner on _____ or _____ for clarification on any of these points.

Yours sincerely,

For
Ian Arnott
PLANNING MANAGER, PLANNING AND INFRASTRUCTURE

Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link
Response to question on notice and supplementary questions – Willoughby City Council

Question on notice:

On page 24 of the transcript, the Chair of the Committee asked a question relating to whether Council has been advised directly by the Transport for NSW project team about when construction will commence for both the Western Harbour Tunnel (WHT) / Warringah Freeway Upgrade (WFU) and the Beaches Link projects (as opposed to what is available on the public record) and if so, when.

Council answer:

Council staff and Councillors have had various meetings with the Transport for NSW project team in recent years on the WHT/WFU and Beaches Link projects. While the project team may have provided information at earlier dates, there have been at least two briefings held within the past year where the project team has definitively advised Council of these dates.

Regarding the Beaches Link, the project team gave the Mayor, Councillors and Council staff a briefing on 10 December 2020. In that meeting, it was indicated that construction on the project was planned to start in 2023 with completion by 2027 and final works at Balgowlah to be completed by 2028.

However, in a more recent briefing (see next paragraph) this has since been revised to early works commencing in 2022 and main works commencing in 2023.

Regarding the WHT/WFU project, the project team gave the Mayor, Councillors and Council staff a briefing on 29 September 2021. In that meeting, it was indicated that main works on the WFU are due to begin in early 2022. For the WHT, awarding of the contract is expected in late 2022 with construction of the tunnel still to be determined. In this same meeting, the revised timing for the Beaches Link was also communicated (as described above).

Supplementary questions and Council answers:

In an email of 27 September 2021, the Committee sent five supplementary questions to Council. Council's answers are provided below.

Note the answers to questions 2-5 relate only to the Beaches Link project, given its location and more direct impact on the Willoughby local government area (LGA), compared to the WHT/WFU project.

1. Have you been given any guarantees that there will be a dedicated bus lane in the tunnels?

In meetings with Council, the Transport for NSW project team has stated that dedicated bus lanes are not currently planned in either the Western Harbour Tunnel or Beaches Link tunnel. While Council has not recommended bus lanes within either tunnel in its submissions on the EIS for each project, this is an idea which Council considers worthy of further investigation.

Council has however recommended bus priority measures (including bus lanes) be considered on surface roads. Council recommended that a condition of the Beaches Link approval be included that requires Transport for NSW to prepare a Road-Based Public Transport Plan. This Review would identify bus priority measures to be implemented on certain existing road corridors that are forecast to see a reduction in general traffic (e.g. the A38 Warringah Rd / Babbage Rd / Boundary St corridor) due to the construction of the project. Road space could be reallocated to bus lanes to

improve bus journey times, promote bus patronage and thus decrease car dependency and congestion.

2. Can you tell us more about the drawdown implications of the project in your area?

In its submission on the EIS for the Beaches Link project, Council raised concerns about groundwater and drawdown impacts relating to the works, as detailed in chapter 16 (Geology, soils and groundwater) of the EIS.

Appendix N (Groundwater) of the EIS details the projected groundwater impacts resulting from the project and proposed environmental management measures.

In summary, according to Appendix N (page x.):

Groundwater drawdown from tunnel dewatering has the potential to impact the surrounding environment and groundwater users by reducing the availability or quality of groundwater. Potential impacts that may arise due to changes in groundwater flow conditions include:

- *Reduced water supply to registered groundwater users (both holders of water access licences and stock and domestic users)*
- *Reduced baseflow to potentially connected surface water systems, with potential to impact ecosystems reliant on surface water*
- *Reduced groundwater availability to groundwater dependent ecosystems*
- *Induced migration of contaminated groundwater plumes*
- *Saline intrusion that reduces the beneficial uses of an aquifer*
- *Activation of acid sulfate soils (ASS) that reduces the beneficial uses of the aquifer*
- *Ground surface settlement*

As an example, Figure 6-5 'Predicted drawdown in the water table after 100 years of operation (south), 2128 (project only)' on page 106 of Appendix N shows that there would be up to a 35-metre drawdown of the water table along the Northbridge ridgeline north of Flat Rock Gully. This is a significant amount of drawdown and would have various impacts as listed above.

Council has raised concerns on what impact drawdown will have on both flora and fauna. Appendix S (Biodiversity development assessment report) of the EIS has noted the potential impact of significant drawdown for Flat Rock Gully in particular.

While both Appendices state that drawdown impacts may be over-estimated through conservative modelling, and could be reduced or managed through various environmental management measures, Council is still concerned that these potential impacts have not yet been fully assessed and the implications this will have, particularly on vegetation around Flat Rock Gully.

In addition to impacts on flora and fauna, Council also has concerns about what impacts drawdown may have on property. As such, in its submission on the EIS, Council has recommended that Transport for NSW convene an independent Property Impact Assessment Panel to independently review condition survey reports, the resolution of property damage disputes and the establishment of ongoing settlement and vibration monitoring requirements.

3. Can you tell us more about the risk to heritage from the project in your area?

In its submission on the EIS for the Beaches Link project, Council raised concerns about impacts on heritage relating to the works, as detailed in chapters 14 (Non-Aboriginal heritage) and 15 (Aboriginal cultural heritage) of the EIS.

In relation to non-Aboriginal heritage, there are several heritage items or conservation areas within the Willoughby local government area that may be impacted by the project. These include:

- Artarmon heritage conservation area
- Naremburn heritage conservation area
- Clive Park and Tidal Pool, Northbridge
- Walter Burley Griffin Incinerator – 2 Small St, Willoughby

The risk to these items or areas has been assessed as 'negligible' or 'minor' as per chapter 14 of the EIS, but Council is concerned that this may be an under-estimate of the risk, or unforeseen impacts may occur in reality that cannot be foreseen through a simple desktop assessment. While various environmental management measures are proposed in chapter 14, Council has made additional recommendations in its submission on the EIS, including that Council and the local community are to be consulted in the design of heritage protection and interpretation measures proposed to be incorporated into the final project design.

In relation to Aboriginal heritage, of particular concern is the area of Clive Park, Northbridge. Construction, operational noise and vibration pose significant risks and hazards to the Clive Park and have the potential to damage and destabilise irreplaceable Aboriginal heritage, namely rock caves, shelters and rock carvings that are highly valued by the local community. Council has made various recommendations in its submission on the EIS in relation to matters of Aboriginal heritage, including that geotechnical, structural and vibration analyses be undertaken before, during and after construction works around Clive Park to ensure that the Aboriginal heritage items are protected.

4. Are there any alternatives to the project going through the tip at Flat Rock Gully that the Council would be prepared to support?

Given the proposed alignment of the Beaches Link tunnel, the Transport for NSW project team has described the necessity of a mid-tunnel 'dive site' between Middle Harbour and the western and southern tunnel portals in Artarmon and Naremburn respectively.

In earlier stages of the project development, the idea of using the Flat Rock Baseball Diamond (on the western side of Flat Rock Drive) was also raised. However, it is understood that following analysis and community consultation, the project team decided that the Flat Rock Gully site (eastern side of Flat Rock Drive) was considered preferable and thus chosen. Use of the Baseball Diamond would seem to be the only viable alternative. However, this would also have unacceptable social impacts given the lack of suitable alternative baseball facilities in the Lower North Shore area, and thus lengthy disruption this would cause for the duration of construction works (approximately 5 years).

Council has not expressed a preference for either site. Council's preference would be for there to be no 'dive site' in this area at all and that the project be tunnelled from the end points only. Without the public release of the Business Case, Council is unaware if this option was considered and if so, why it was discounted. No other alternatives have been proposed and therefore there are no alternatives that Council would be prepared to support.

5. Can you expand more on concerns around air quality, especially in terms of schools, parks and RNSH?

In its submission on the EIS for the Beaches Link project, Council raised concerns about impacts on air quality relating to the works, as detailed in chapter 12 (Air quality) of the EIS.

Council is concerned about airborne contaminants and silica during the construction phase of the project, as well as ongoing air quality due to the proposed ventilation stacks to be located in Artarmon and Cammeray. Sensitive locations such as schools and the Royal North Shore Hospital are always of particular concern, but of more direct impact during construction will be the recreational facilities located near the proposed 'dive site' in the area near Flat Rock Gully (i.e. Flat Rock Reserve, Willoughby Leisure Centre, Willoughby basketball / netball courts, Flat Rock Baseball Diamond and Hallstrom Park / Bicentennial Reserve Oval).

Council has made various recommendations in its submission on the EIS relating to air quality. These would involve conditions of any approval that require:

- Transport for NSW and its contractors to create a detailed analysis and plan for impact mitigation to ensure that there will be no detrimental effects on air quality from airborne contaminants or contaminated land, either during construction or once the project is complete.
- Transport for NSW and its contractors to provide Council with a detailed analysis and plan for impact mitigation to ensure there will be no detrimental effects of exposure to silica dust during both the construction and operational phases of the Project.
- Installation of monitoring and access to real-time air quality monitoring data for the community during the construction phase of the project. Monitoring should include alerts including an on-site monitor screens at Bicentennial Reserve Oval and Flat Rock Baseball Diamond to alert sport users to poor air quality events.
- The EPA to install and maintain permanent air quality monitoring equipment at various locations in the vicinity of the project once complete to monitor emissions.