

Public Works Committee

Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link

Hearing 17 September 2021

Replies to the Committee's Supplementary Questions-

1. You spoke about consultation around the early works. Did you have any concerns about consultation during the planning process?

1. In relation to consultation during the planning process the simple answer is there was none.

TfNSW (or its prior iteration RMS) undertook lectures which consisted of their representatives telling us what would be happening and not responding to relevant questions.

With changes to the rules in relation to consultation with communities affected by proposed major public infrastructure projects, TfNSW has been required to change their approach.

However, having said that a post WHT/WEU EIS approval by DPIE of certain early works which resulted in adverse safety risks for the APPS school population caused us to write to TfNSW and DPIE, and it was that sustained pressure which initiated the consultation process with TfNSW and the Contractor, SPA.

We meet at regular intervals as does our Principal but those meetings at times test the definition of 'consultation'. We have added a Supplementary Submission setting out the benefits, challenges and deficiencies of these consultations.

We take the view that being able to meet regularly and raise concerns is better than not engaging TfNSW. At best we get some change and at worst any failings on their part (TfNSW) may ground actions and representations to decision makers.

2. Are you aware whether other schools in the area who are highly affected have had consultation around the early works?

2. Aside from Wenona College we are not aware of any other School as one directly affected as APPS is to WFU early works.

We understand Wenona had a consultation process with the Government prior to the commencement of early works.

As we indicated it required some questionable TfNSW representations underpinning a post WHT/WFU EIS approval (allowing without restriction large truck traffic along poorly constructed roads and intersections which had significant school children foot traffic) and concerted representations from us to both TfNSW and DPIE, to get the consultation process underway.

3. Are you satisfied with contamination management and mitigation at local parks around the school?

3. With respect to contamination management and mitigation at Anzac Park and Cammeray Golf Course we are not satisfied.

We refer to our Supplementary Submission in relation to our September 2021 meeting where questions were asked and not answered.

We are concerned a member of SPA (the WFU early works Contractor) is also providing contamination reports and not an independent body. This concern extends back to the EIS process where in the EIS TfNSW outlined contamination issues would be reported on by an independent body but in their responses to community concerns 'walked back' from that position indicating contamination reports would only be completed by an independent body where the contamination issue was 'complex' (one assumes as determined by TfNSW). With the DPIE approval process that last position became part of the conditions of approval, so an independent body is only engaged when the issue is 'complex'.

Further the attitude is of concern, TfNSW relying on Sydney Water works in Anzac Park to state they are 'doing the same thing' and should not be pursued for contamination issues. We note the problem here is the Sydney Water works are not the same, Sydney Water is operating through existing subsurface access so they are not disturbing the soil as TfNSW and SPA are in Anzac Park.

Further, recently in Cammeray Golf Course, across the Freeway from the School, SPA workers were breaching the subsoil without taking any measures to eliminate air pollution/contamination and when approached by local community members knew nothing about any risks or any need to eliminate or at the very least minimise contamination/pollution. The relevant area is not as clearly in the public's sight/mind as it is adjacent to a small cul de sac road in an area not traversed by the public unless you live in that cul de sac (unlike the highly visible areas in Anzac Park and the Cammeray Golf Course adjacent to Ernest St).

Therefore we are not satisfied and very concerned about getting proactive control in place with independent reporting and oversight before major contamination works (the WFU main works) start.

4. According to the EIS, is Anzac Park school modeled to receive higher levels of pollution? a. Are other schools in the area modeled to receive high levels of pollution?

4(incl a) In Chapter 12 of the EIS there are detailed outlines referring to modelling and a number of charts and graphs relating to going forward with partial/full changes in 2027 and 2037. There are charts and graphs relating to various types of pollution, NO<sub>2</sub>, PM<sub>2.5</sub> and PM<sub>10</sub> all of which require some knowledge to dissect and understand.

From what we can see bar in some instances, that is PM<sub>10</sub> ('do something for 2027' and 'do something cumulative for 2027') and PM<sub>2.5</sub> ('do something 2027') (where there are small decreases), every graph appears to show increases for the School.

With 1hour/24 hour and annual calculations with an 'average' figure there are substantial exceedances for PM10 and PM2.5 at most receiver locations, with figures being below (just in the 1 hour calculation) 'averages' for NO2. It is unclear whether these 'averages' are acceptable or unacceptable figures, not being qualified in that area we are unable to comment.

It is noted that with the EIS documenting these increases they are considered acceptable to the Government and provision of pollution adversely affecting the short and long term health of the School population is quite ok and serves as the basis for not filtering the pollution stacks.

Also there is no comment on the wider beneficial impact of filtration of the pollution stacks on the general Greater Sydney community and enhancing our ability to meet net zero carbon targets etc. It is missed in the EIS and all the material provided, that even if you accept the TfNSW and their experts' assertions that filtration does not create a benefit to those near the pollution stacks (we do not accept that position and overseas experts and experience corroborate our position), there is no comment, expert or otherwise, on the benefit of capturing that pollution rather than letting it disperse into the air used by all of us.

As the graphs and charts refer to receivers by number and are a number of them are schools (one can also tell they missed some schools). All are in a similar position to the School in relation to increases.

In other modelling, graphs and charts prepared by TfNSW (or predecessors) it was conceded that pollution levels relevant to the School were at 8 ug/m3, a level which is the maximum the school population could cope with and the Projects increased that to 9ug/m3 which is an unacceptable level noting that the maximum allowable figure is shortly due to come down to 7ug/m3. At the time the TfNSW 'speak' was this was a little increase over an already 'poor' situation which the School was coping with so what is the problem.

In addition to the 'in operation' position above Chapter 12 outlines details in relation to the 'in construction' phase pollution impact. It is not as detailed and the relevant map is unclear and hard to read, it appears to leave out a number of sensitive receivers including the School. However the chart provided refers to the area the School and others are in as being high risk for pollution impacts during construction.

We note there is also Appendices H (part 1) & (part 2), about 700 pages combined which inter alia provide maps, lists and tables of the material provided for in Chapter 12. There are maps in Appendices H which outline the cumulative effects of NO2 and PM2.5 which show the School and other local schools in marked areas which are adversely affected by that form of pollution. You need to read some of the maps carefully as they amend the scale so the earlier and later areas look the same size but a review of the different scaling shows the impact on the later time map is double the size of the former time one.

5. According to your submission you argue that "road use externalities" are not sufficiently costed. Can you explain this further?

5. With respect to the WHT/WFU cost benefit analysis reviewed by Infrastructure Australia there were line items where their impact (positive or negative) was given a \$m value which

when added to together provided the indication whether the benefit outweighed the negative.

One of those line items was "road use externalities".

The review went on to define road use externalities as including air pollution, greenhouse gas emissions, noise and water pollution, impacts on landscape, urban separation and road damage, and their impact on the community.

To put that into perspective in relation to the figures provided (and therefore question the worth of this analysis), the cost of tolls was \$632m (a negative) and the cost savings for motor vehicles allegedly no longer stop/starting was \$256m (a positive), yet the community cost of the road use externalities was \$117m (a negative), 1/5 of the toll cost figure and 9/20 of the vehicle maintenance cost.

Given what the term road use externalities was representing and their real impacts, it is hard to see their cost is calculated as a small fraction of other, in reality, smaller costs.

It is noted that in a recent report prepared by Deloitte's in relation to the potential outcome for air pollution health impacts alone if we maintain the present support for the uptake of BEV's (currently less than 1% of sales), that is minimal to nil depending on the Government the cost for NSW will be \$257.7billion (with Sydney being the major vehicle user bearing most of that cost). So a figure of \$117m in the cost benefit analysis to cover all road use externalities is clearly not a realistic figure.

With respect to the authors this cost benefit analysis, aside from the COVID impacts, needs to be redone with real accurate costs included.

6. Do you think alternatives to this project have been sufficiently explored?

6. Alternatives have not been properly or sufficiently explored.

As these are "road" projects, rail options were not considered or explored.

Even as "road" projects these projects have not properly assessed incorporating a major bus system which would reduce private motor vehicle use of these Tunnels or at the very least add in a bus only lane to the motorways in the Tunnels.

As these Projects, if built, will be sold on to private interests, the incorporation of a dedicated public transport system (buses) would greatly reduce the toll income and subsequent sale price of the Projects, so the Government has chosen to avoid including those systems in their proposals for the Projects.

Also even if the Projects definition extended beyond "road" a rail system would also be not easily sold by the Government, a reason for it not being included as an alternative from the get go.

7. Are you concerned about the economic impact on families of 8 years of heavy construction works and a large amount of compulsory substratum acquisition?

7. The P & C are greatly concerned about the economic impact on families arising from 8 years of heavy construction works and compulsory substratum acquisitions. The adverse economic impact will include:

- i. increased medical fees due to increased visits to medical practitioners and hospitals due to increased ill health (physical and mental) from the construction works including poor air quality, & contamination, increased noise especially night works and increased traffic congestion around the works.
- ii. lost wages/increased sick leave use due to family ill health (parents and children) (physical and mental).
- iii. increased expenses arising from greater fuel use due to increased traffic congestion.
- iv. reduced real estate values due to construction works, increased traffic congestion and Tunnels being located under properties (perceived sink hole risk).

8. Do you feel the project is delivering joined up and effective active transport links that will encourage more people toward active modes of transport? a. How could options for active transport be improved within the project plans?

8. As these Projects are "road" projects with limited to nil proper incorporation of proper road based public transport systems (buses), the users of these Projects will engage in active transport from their front door to their car door only.

Therefore to reply, the Projects are not delivering joined up and effective active transport links that encourage people toward active modes of transport.

- a. The options could be improved if the Projects either properly incorporated road based public transport (buses) or changed to a rail project. With either option there would be pick up/drop off points along the Projects routes which could be designed to promote active transport to and from the pick up/drop off points and homes.

9. What are your concerns around trucks across the area, not just those directly around the school but in the area more generally with so many children moving around?

9. With the WFU early works the concerns relating to trucks were mainly in relation to safety with trucks to traverse major foot traffic areas at times when children would be travelling to and from school.

With the WFU main works, and the WHT & BL Projects the concerns relating to trucks will be:

- i. trucks travelling on routes used by children on foot be they APPS children or other local schools.

Notwithstanding TfNSW assertion the access to and from the Cammeray Golf Club site (CGC Site) will be on and off the Warringah Freeway there will still be truck traffic on the Miller Street entry/exit ways to facilitate access to the CGC Site and those Miller St entry/exit ways are heavily used by school children foot traffic before and after school and are presently not designed fro child safety /multiple large truck access.

Also one expects these trucks to use other “options” when the Warringah Freeway is blocked/moving slowly which means “rat runs” around the local schools putting children at great unacceptable risk.

- ii. noise and air pollution from slow truck movements and idling (waiting for access). The noise would impact children near the trucks whereas the air pollution will affect all local school children.