

## **INQUIRY INTO CROSS CITY TUNNEL**

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Date Received: 17/01/2006

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Theme:

Summary

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15 January 2006

The Director  
Joint Select Committee on the Cross City Tunnel  
Parliament House  
Macquarie Street  
Sydney NSW 2000

Dear Director

## **Joint Select Committee InQUIRY InTO the Cross City Tunnel**

I am writing to you concerning the *Environmental Impact Statement (EIS)* in 2000 and the *Supplementary EIS* in 2002 for the proposed **Cross City Tunnels (CCT)**, **the approvals without any Commissions of Inquiries** of the two proposals, **the contracts and the impacts when the project opened on Sunday 28 August 2005**. I am also **concern of the public / private development** of the CCT and earlier **Government's Public / Private proposals since 1986 and continuing to present**.

As a town planner since 1971 and a traffic and transportation since 1974, I have been involved in planning, design and assessment in metropolitan Sydney both in the public service and as consultant. I was also a joint editor of *Sydney Planning or Politics – Town Planning for Sydney Region since 1945* launched by the Hon Knowles, Minister for Infrastructure, Planning and Natural Resources (IPNR) in 2004 and a member of the Forums in during 2004 for Sydney's future.

### **Summary**

The State public / private contracts started in 1986 for the proposed private Harbour Tunnel without proper options for improving metropolitan Sydney's transport. The pressure from the Government is to improve public / private without cost resulted some poor impact shown as the Cross City Tunnel, with no independent of assessment before making the decision. My recommendations are:

1. A new Authority is required a Board from Officers of a wider Government organisations, Local Government and members from companies and environment planning groups to assess proposed public / private developments.
2. Improvements are required for the Cross City Tunnel (CCT): a.) to reduce the local residential and business impacts and improve free cost for vehicles crossing from William Street to the North Shore, and b.) State Government could or may have to pay the cost above.

## **Detail Assessment of the Contracts / sales / long leases, including the Cross City Tunnel**

Since 1986 the State Government has approved major contracts / sales / long leases in metropolitan Sydney. As set-down there are eleven (11) examples approved or could be approved over the last 20 years:

1. Sydney Harbour Tunnel
2. Monorail
3. Eastern Distributor
4. Airport railway
5. Royal Easter Show site, Paddington
6. Prince Henry Hospital, Little Bay & Women Hospital, Paddington
7. Cross City Tunnel, between Darling Harbour and Rushcutters Bay
8. Western Orbital Road now called M7
9. Water Desalination, Kurnell
10. Eastern Darling Harbour, and
11. Rozelle Hospital and Callan Park

### **1. Sydney Harbour Tunnel (several Tunnels) EIS 1986 & open 1992**

The recent private tunnels under the Harbour started in 1986 and the next year was signed on 29 June 1987 resulting a 30 year contract from 1992 to 2022. The cost of vehicles for using the Bridge was increased when the Tunnel opened in 1992. The proposal approved by the Government was to relieve the use of the Bridge but in ten (10) years from 1992 to 2002 the Bridge increased before opening the Harbour Tunnel. Further more this proposal resulted more pressure for the proposed Eastern Distributor (see Section 3. Below), rather than major new roads around the inner Sydney. Further more again there were no proper options for improvement public transport or any better outer-west major transport going back in 1986.

### **2. Monorail in the City 1988**

The State Government in 1984 proposed to redevelop for Darling Harbour for the '200 year' achievement for 1988. There were options for connecting to the CBD. As a new Act for the public area the redevelopment allowed approvals without the *Environmental Planning & Environment Act 1979*. There were several private submissions with no proper public comment. Through the Ministers, Hon Breraton MP and Hon Carr MP, there did not allow or need an *EIS* of the proposal.

The result was the Monorail, a one-way line with structures above the CBD Streets, from Liverpool Street - Pitt Street - Market Street and then across Pymont Bridge to Darling Harbour going around to Liverpool Street. Apart from the physical structures with now outside boards on the monorail, there was no connections to the railway stations and the unusual loud noises as it goes through the city streets. It is most use for tourists, was \$1 in 1988, now \$4. If it only 25 years till 2013, or earlier before it comes down. There was a proposal in 1986 from the RAI, RAPI (now PIA), AILA and the National Trust connecting to Town Hall with minimum physical impact with 10% cost, but dismissed.

There was no proper assess of the Darling Harbour's transport to the CBD and the inner Sydney. The new light rail using the old lines started from Central to Glebe in 1998 then now

to Lilyfield and proposed to Circular Quay. As shown in the *SMH* last week, almost every day, the Government should support light rail through the City and extent in the inner suburbs. A new independent organization is required for further assessment.

### **3. Eastern Distributor 1999**

As discuss in the Private / Public of Sydney Harbour Tunnel in Section 1. there were further pressures to extend better link to/from the Airport for the proposed *Sydney Olympic 2000*. It could be rail link only to the Airport. However the Eastern Distributor was approved for Public / Private and opened in December 1999. Now it is a major road link through the City of Sydney to/from the North Shore rather than around the inner part of the Sydney.

Further assess required of the options could have been conceded.

### **4. Airport Railway 2000**

As result of the Award for *Sydney Olympic 2000* it was important for the rail link to the Airport. There was now decision for a 2<sup>nd</sup> Airport or it could not opened by 2000. The proposal was private developer – it may cost only a little more for the rail link. The Airport Stations was open in approximately April 2000. However with the high cost and the new open Eastern Distributor earlier the private rail link was loss income, now coming back into public domain, but very high cost by the State Government.

Perhaps the tickets to be reduced for the rail link to the Airport, normal cost, rather using the vehicles on the Eastern Distributor. Further assess for Public /Private should be considered for the new Authority.

### **5. Royal Easter Show site, Paddington 1995**

Similar in 3. and 4. above as the proposed Sydney Olympic 2000 allowed the larger site for the Royal Easter Show in Homebush Bay. However the very long leased was sold very quickly from both Federal and State Governments for Fox Studios. It was only a very short time for more private owner for further development and long hours. There was no proper assessment as well part or all for public land. Further more there was no proper public transport to allow light rail to the Sydney Football Stadium and the Sydney Cricket Ground – even extent to the now 40,000 students at University of NSW in Kensington.

Further of the transportation of the major development of Studios, Stadium and the Cricket Ground could considered for a new organization of the Authority.

### **6. Prince Henry Hospital, Little Bay & Women's Hospital, Paddington, late 1990s-**

These public hospitals were sold. The Prince Henry Hospital is now selling off – some over \$1M per residential lot – with most of the buildings has been removed. Yet the Department of Health required special public hospitals such as short and long brain injuries and psychiatrist centres away from the more dense hospitals in the eastern and inner west suburbs. There are no or minimum further land left. Perhaps the redevelopment of the old Women's Hospital for residential housing and new public park in a inner part of Sydney but not a proper assessment was considered.

## 7. Cross City Tunnel 2005

The proposed Cross City Tunnel resulted as the 1996 City of Sydney Council's proposal under Drutt / Park Streets to the beginning William Street at side Australian Museum. The RTA 'took-over the proposal' and developed the longer tunnel, 1.7km long under most of William Street to connect the Kings Cross Road Tunnel. The proposal had an *EIS* but the real transport options considered in the *EIS*.

There were over 400 submissions including concerns from the Leichhardt Council, South Sydney City Council and Woollahra Municipal Council, asking for a Commission of Inquiry. There also concerns from our PIA NSW Division and myself, asking for an Inquiry. It was most surprise there was no Inquiry and approved with conditions.

Following by the Contract for the proposal, a further was proposed extending underneath the Cross City Tunnel going into New South head Road in Rushcutters Bay being 2.1Km long, impact further residents and surrounding properties – almost 10 suburbs. For some unusual discussion the proposal became *Supplementary EIS's Cross City Tunnel* rather than a new *EIS*. There were over 1000 submissions for the new proposal including all the Councils around the proposal – City of Sydney, Leichhardt, South Sydney City and Woollahra Municipal Councils plus the PIA NSW Division) and the RAIA (Chapter NSW). The submissions ask for an Inquiry. I understand there were no submission from the Department policy Railway and Buses organisations. The submissions were received to the RTA then to the Department of IPNR. The approval without no Inquiry was approved in the Christmas week, just before the end of 2002.

As you will know the proposal was open on 28 August 2005 with enormous impact of the streets around by closing streets from William Street to the North Shore and the street around Drutt Street. Further more any site inspection will see further CBD streets such as Macquarie Street and Bridge Street increased the vehicles.

Both the two persons who were the former Directors of the RTA and Department of IPNR must be appear and give evidence to the committee of the earlier proposal and the now proposal.

See.

## 8. Western Sydney Orbital Road now called M7, between Seven Hills (M2) and Preston (M5) with connect to M4, December 2005

A further private / public for the proposed Western Orbital Road now M7 which was opened by the Prime Minister, Hon John Howard on 15 December 2005 express the private development with a large cost of the 'Federal Auslink'. However the proposal in the *EIS* do not have easily or proper connecting with suburbs – around with no public links in the proposal. Even with submissions concerning the proposal it was approved without any Commission of Inquiry. The new Government's *metropolitan Strategy* (30 years) launched by the Premier, Hon Morris Iemma on Sunday 4 December 2005 presented a 'Western Sydney Employment Hub' connecting the M4 to the new M7, but the Hub are for vehicles connections only. A proper transport was not assessed because the proposed Motorways were free as Public / Private. Further transport will be required.

## 9. Proposed Water Desalination at Kurnell 2005-

There is public exhibition of the *Environmental Assessment (EA)* for the *Kurnell desalination project* from Thursday 24 November 2005 until Friday 3 February 2006. The proposal will be a private development backed by the State Government. However the *EA* does not present options of the need of the desalination, and any further sites as well as Kurnell.

An independent assessment must be required as a proper Commission of Inquiry.

## 10. Eastern Darling Harbour 2005-

In August 2005 there was an Exhibition of the Stage One Finalists for develop of the largest public site in the CBD. It would see to be the higher dollars with little return to Sydney with no public transport and no public housing or low residents. There was no maximum density but a 50% public areas. The Committee **did not include officers from the Ministry of Transport or Department of Housing**. Now the Government added the ex Prime Minister, Hon Paul Keating MP on the Committee. But as being in Sydney's Prime Minister's Kirribilli House between late 1991 to 1995 the Hon Keating stated several times to remove Woolloomooloo wharves because of the view south to Woolloomooloo: it is now kept. An independent review is required to assessment for the sale and the Committee for the Stage 2.

## 11. Rozelle Hospital and Callan Park 2002 & 2005-

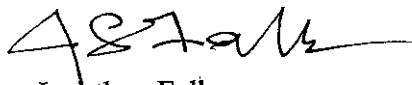
There were proposal to sell off the Rozelle Hospital for housing rather than keeping part of the use for psychiatrist buildings and add part of Harbour Foreshores and Foreshores. In 2002 the Leichhardt Council and residents was able to stop the proposed development which is mostly public park around Callan Park. The Director of the old Department of IPNR supports the development over the last few years after 2002.

Some proper new organization is required for assess further regional hospitals and the public land of the Harbour Foreshores and Foreshores connecting King George and Leichhardt Parks for private development.

## Conclusion

As discuss in the eleven (11) sections above there were or now consideration of poor decisions. A new organization is required with direct to the Premier (see Summary above). I am happy to discuss this submission further with you and the members of the Committee.

Yours sincerely,



Jonathan Falk

BTP Hons (UNSW), M EngSc (UNSW), Cert TTCP, FPIA

Member PIA NSW Committees / Sub-committees concerning Sydney since 1978 to present

Member RAI Chapter NSW Housing & Urban Design Sub-committee 1983 - 2005

Joint Ed. *Sydney Planning or Politics - Town Planning for Sydney Region since 1945* Public

PRC, Univ. Syd. 2003 and Member of *Sydney Future Forums 1 & 2* in 2004

ATTACHMENT MY SUBMISSIONS

JONATHAN FALK PLANNING CONSULTANTS PTY LTD

29 AUGUST 2002 WITH ATTACHMENTS A AND B; 4 OCTOBER 2000

# Jonathan Falk Planning Consultants Pty. Ltd.

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29 August 2002  
General Manager  
Cross City Tunnel EIS  
PO Box 380  
ROZELLE NSW 2039

Dear Sir,

## **Objection to Proposed Cross City Tunnel ('Sydney City Tunnels') Supplementary Environmental Impact Statement**

I am writing to object to the above proposal. I have reviewed earlier proposals, including the EIS Cross City Tunnel 2000 and **Volumes 1 and 2** of the **Supplementary EIS** by PPK Environment & Infrastructure Pty Ltd, dated July 2002. I submitted an objection to the 2000 proposal on 4 October 2000 (copy attachment B).

The new proposal (still called **Cross City Tunnel** rather than **'Sydney City Tunnels'**) extends and changes the original proposal in the following ways:

- The main tunnels are now longer (a 17% increase from 1.7 km to 2.1 km each);
- The estimated number of vehicles using the tunnels has increased by 22% from 78,000 to 95,000 per day; this will result in high air and noise pollution from the tunnels on main roads and local roads through Glebe, Ultimo, Woollomooloo Paddington, Rushcutters Bay, Darlinghurst, Darling Point, Edgecliff and Woollahra, particularly in the City of Sydney, Leichhardt, South Sydney City and Woollahra;
- There are additional connections to other main roads and local roads in metropolitan Sydney;
- The height of the stack at Darling Harbour has been increased by 36% from 44m to 60m (the equivalent of a 21 storey-high building) and will have a serious impact on the physical environment;
- There has been a 60% increase in the cost from \$400 to \$640 million, not including additional costs for connecting roads and the improvement and/or reduction of local roads;
- There are still six (6) separate tunnels and eight (8) portals.



The proposed Cross City Tunnel Supplementary EIS should not be approved for the following reasons:

**1. Objections to earlier proposal by three (3) LGA Councils**

Three (3) LGA Councils (Leichhardt, South Sydney City and Woollahra) objected to the proposal of October 2000, and will have even stronger objections to the Supplementary EIS. These three LGA Councils represent 200,000 people who will be affected by the tunnels, compared to the 30,000 represented by the City of Sydney Council, many of whom are non-permanent or short-stay residents.

**2. Contrary to NSW State Government's Action for Transport 2010**

The proposal will result in increased car traffic in and around the City of Sydney (up to 100,000 vehicles per tunnel per day), rather than improved public transport. This is completely contrary to the Action for Transport 2010, supported by Carl Scully MP, Minister for Transport and Minister for Roads in 1998.

**3. Travellers will be induced to use cars to and from the City of Sydney**

The increase in the number of roads will encourage people to use cars to travel to and from the City of Sydney, rather than take public transport. This includes to and from the North Shore, West, East and South into the City. For example, travellers to and from Sydney Airport, Port Botany, Olympic Park and Moore Park Stadium will drive via the City rather than using the outer areas or going by public transport. There are numerous examples of this over the past 30 years in cities in the United Kingdom, Europe and the United States.

**4. Impact of additional vehicles on inner residential suburbs**

In the 2000 proposal, Leichhardt, South Sydney City and Woollahra Councils noted that there would be an increase in the number of vehicles through several suburbs within their respective LGAs, including Darling Harbour, Glebe, Ultimo, Woollomooloo, Rushcutters Bay, Paddington, Darlinghurst, Darling Point and Woollahra. Under the new proposal, more areas will be affected, with a large increase in the number of vehicles using New South Head Road, Barcom Avenue, McLachlan/Boundary Streets and Ocean Street. This will result in:

- increased vehicle noise over a 24-hour period;
- increased vehicle pollution;
- increased risk to pedestrians.

## 5. **Reduced public transport (buses, rail and light rail)**

More use of private vehicles will result in less use of public transport, even for short journeys into the City. This will inevitably lead to a reduction in Government buses and trains in and around the City. For example, the bus journey from Paddington to the City now takes an average of 10-15 minutes. As a result of the new proposal, there would be increased waiting times and a reduction in patronage. In some areas, services may be cut altogether.

There will also be less likelihood of an extension to the rail and light rail systems. This has not been addressed in the Supplementary EIS.

## 6. **More pollution, not less, within the City of Sydney, Leichhardt, South Sydney City and Woollahra LGAs**

There is high pollution in the inner part of Sydney and to the west of the City as a result of high density apartment development, office buildings, shopping centres, hotels and short-term car parking for deliveries by cars, vans and trucks in the CBD. The new proposal will increase the number of vehicles using the two tunnels, in addition to the connections to the north and south main roads, within a 3 km radius of the City. There are three (3) areas of concern:

- **Inner Sydney Basin:** During the period 23 December 2001 to 6 January 2002, no rain fell in Sydney and there were major bushfires around the edges of the metropolitan area, with the highest air pollution ever recorded. The new proposal will increase the inner Sydney basin area, and therefore the potential for unacceptable levels of air pollution.
- **Inner Western Sydney Basin:** The westbound tunnels have a 60 m high stack at Darling Harbour, an area that records very low wind levels. Several days of light wind or no wind will result in high pollution at Darling Harbour. This has been an important tourist area since 1988, and in more recent times, has been the location of apartment development, mainly for short-stay residents. This development was strongly supported by the City of Sydney through the *1977-80 Strategic Plan Review*. The new proposal, with the 60 m stack at Darling Harbour, will therefore have a devastating effect on the inner western basin.
- **Inner Eastern Sydney Basin:** The eastbound tunnels will have a direct impact on the three residential buildings on Kings Cross Road/Craigend Street above Kings Cross tunnel (*Elan, Millenium* and *Altair*), one of which, *Altair*, won a prestigious international architectural award in August 2002 (see point 7 below). The tunnels will also affect proposed developments at the White City tennis complex, which is to be rezoned to accommodate 80 apartments, and the nearby former Advanx Tyre and Rubber Factory, fronting Nield and McLachlan Avenues, which may

also be rezoned to allow the development of 200 apartments in the South Sydney City LGA.

**7. Possibly world heritage listing of *Altair***

The *Altair* building, which received an international award in August 2002 (see point 6 above), is located just above the two main portals of the tunnel on the east side. *Altair* may receive world heritage listing. If so, a further assessment will be required under the *Environment Protection and Biodiversity Conservation Act, 1999* (Commonwealth). There is no mention of this in Appendix C, Volume 2 of the Supplementary EIS.

**8. Increased vehicle noise in inner city LGAs**

The increase in the number of vehicles using the two new main roads will result in increased noise pollution, particularly at the entrance/exit points at Darling Harbour into Glebe and Rushcutters Bay into Darlinghurst, Paddington, Edgecliff and Darling Point.

**9. Pressure for more long and short-term car-parking spaces**

The new proposal will result in enormous pressure for additional car-parking spaces in the City of Sydney, both long-term (office workers and apartment residents) and short-term (shoppers and visitors). The City of Sydney Council has supported increased car-parking in the City, for example underneath Woolworths (corner of George and Park Streets). The State Government is unlikely to object to additional car-parking if the new proposed is approved.

**10. No reduction in vehicles, but risk to pedestrians in the City of Sydney**

The new proposal would not, in the long-term, lead to a reduction of vehicles in the City of Sydney. A direct comparison can be made with the Sydney Harbour Tunnel. The tunnel, opened in August 1992, was intended to alleviate traffic congestion on the Sydney Harbour Bridge. This may have been achieved in the short-term, but within eight (8) years, the number of vehicles using the Harbour Bridge had returned to pre-1992 levels.

Without a reduction in the number of vehicles in the City of Sydney, pedestrian safety will remain a concern, as well as pedestrian exposure to increased levels of air and noise pollution.

**Concluding Points**

- For the reasons set out in points 1-10 above, the Cross City Tunnel Supplementary EIS should not be approved. A new EIS should be carried out

which should examine other transport options for metropolitan Sydney, taking account of air and noise pollution, heritage and cost.

- The proposed Cross City Tunnel will have an enormous impact on metropolitan Sydney. It is therefore important that a **Commission of Inquiry** into future transport for metropolitan Sydney be established before any decisions are made, the Commission to include a Commissioner from outside the State of New South Wales.
- I am prepared to go to the **Land and Environment Court of New South Wales** to request an order to establish a new EIS if the proposed Cross City Tunnel is approved.

Yours faithfully,



Jonathan Falk  
Director

*Attachments:*

- A. List of further information required for the Supplementary EIS Cross City Tunnel 2002.
- B. Objection to Proposed Cross City Tunnel by Jonathan Falk Planning Consultants Pty Ltd ('Sydney City Tunnels'), 4 October 2000.

## Attachment A

### List of Information Required for Cross City Tunnel Supplementary EIS 2002

**1. Air Pollution of Inner metropolitan Sydney (Leichhardt, City of Sydney, South Sydney City, and Woollahra Municipal Local Government Areas)**

Information for the period 23 December 2001 to 6 January 2002 (two weeks) when there were bush fires and no rain. Daily pollution levels in the metropolitan Sydney basin were extremely high, with the air quality index measuring between 100 and 200 (50 is considered high). Levels may be even higher if the new proposal goes ahead.

**2. Further Information on Main Roads and local roads**

Ocean Street, Darling Point Road, Greenoaks Avenue, Ocean Avenue, McLachlan Avenue, Neild Avenue, Boundary Street, Barcom Avenue, South Dowling Street, Lawson Street, Glenmore Road, Underwood Street and Heeley Street.

**3. Public Buses**

Information needed on changes in travelling times to and from the City, including routes 324, 325 and 389.

Information needed on possible reduction in services to and from the City if travellers switch from buses to cars.

**4. World Heritage**

Assessment of possibility of World Heritage listing of the *Altair* Building, which won an international award in August 2002. (See *Environment Protection and Biodiversity Conservation Act, 1999*).

**5. Further Residential Housing**

Further information on impact of new developments at the White City in Paddington (80 apartments) and the former Advanx Tyre and Rubber Factory, fronting Neild and McLachlan Avenues in Darlinghurst (200 apartments). There may be further major redevelopments in Ultimo.

## **Attachment B**

**(Jonathan Falk Planning Consultants Pty. Ltd.)  
PO Box 319 Paddington NSW 2021**

4 October 2000

RTA Project Manager  
Cross City Tunnel EIS  
PO Box 248  
CONCORD WEST NSW 2138

Dear Sir,

### **Objection to Proposed Cross City Tunnel ("Sydney City Tunnels") Environment Impact Statement (EIS)**

I am writing to you to **object to the proposed Cross City Tunnel EIS**. I have seen and discussed your early proposals over the past two years and reviewed the seven (7) volumes and the summary of the Cross City Tunnel Environmental Impact Statement (EIS) by PPK Environment & Infrastructure Pty Ltd dated July 2000.

These **proposed six (6) Sydney City tunnels** with eight (8) portals under three (3) Local Government Areas in NSW **will increase vehicles through and around the inner part of Sydney which will affect the whole population of Metropolitan Sydney**, with little benefit but much detriment.

These are the ten (10) points I would like to raise:

- 1. Design of Proposed Several Sydney City Tunnels**
- 2. Unclear Information on Long-Term Forecasts**
- 3. No Relation to Other City Tunnels in Australia and Overseas**
- 4. Increased Vehicle Air Pollution in Inner Metropolitan Sydney**
- 5. Increased Vehicle Noise Pollution in Inner Metropolitan Sydney**

6. **Projected Further Increase in Vehicles** in Metropolitan Sydney
7. **Short Construction Jobs Only**, with No Long-term Jobs
8. **Increased Cost of Proposed City Tunnel with New Payment Tolls**
9. **Increased Cost Local Road Maintenance** with Reduced Public Transportation
10. **Proposed Inquiry into the EIS Cross City Tunnel**

Further information is set out below, with a concluding point in each section.

### 1. **Design of Proposed Several Sydney City Tunnels**

The proposed Cross City Tunnel has six (6) separate tunnels with eight (8) portals under three(3) Local Government Areas (LGAs), a length of 2 ½ kilometres and a maximum width of half a kilometre. Well over 100,000 people live within the LGAs apart from over 200,000 workers and tourists. As shown in EIS Appendix A of technical paper No. 3 there will be a further increase residents in the three LGAs. The proposed tunnels will also link the main freeways being the Orbital Route of metropolitan Sydney, a city with a population of 4 million as at December 1999.

As shown above, I ask that the **title of this EIS be changed to (at least) "Proposed Sydney City Tunnels"** to give a **more accurate description** of the proposal and to show in this EIS the **wider integration of vehicles in metropolitan Sydney**.

Furthermore this '**proposed Sydney City Tunnels**' needs to be part of any **proper possible future plan of Metropolitan Sydney** by the Department of Urban Affairs and Planning. Further information is required.

### 2. **Unclear Information on Long-Term Forecasts**

#### 2.1 **No relation between increased City workers and City vehicles**

As shown in the EIS, the number of city workers is projected to increase from 217,000 in 1996 to 233,000 in 2016 (an increase of only 7.37% in 20 years), **but** the traffic volume in the Central Business District (CBD) is projected to increase by 12% to 15% from 1998 to 2016. Market Street traffic volume is projected to increase by 60% from 1998 to 2016.

There is **no clear information to show that the increase in the number of vehicles would be almost double that of the number of city workers**.

There is no further information on **long-term trends (certainly 25 to 30 years)** on the number of vehicles and city workers and their relation between the two.

## 2.2 Unrelated to Metropolitan Sydney

The tunnels will **induce an increase in vehicles from other parts of Metropolitan Sydney**. For example, from the north-east area (over the Harbour) 'further links' to the west, and from the south-west and beyond.

Furthermore, the proposed Sydney Harbour Tunnel (EIS by Cameron Namara, November 1986) shows that it may have induced increased traffic as a result of the opening of the tunnel in the 1990s but now the traffic is moving very slowly much of the day. The EIS for the Eastern Distributor which opened in December 1999 shows that this could also induce **north-south traffic through the city** rather than around the inner eastern suburbs as set down in the Department of Urban Affairs and Planning's report on the EIS to the Minister.

There is no **proper information about the relationship between the proposed "Sydney City Tunnels" to the Metropolitan Sydney**.

## 2.3 Possible Impact of Oil Prices on Private Vehicles

Furthermore, there is no increase or reduction in the number of vehicles as a result of the increase in petrol prices. As shown in the *Sydney Morning Herald* on 22 August 2000, the cost of petrol has increased from 63 cents per litre in the third quarter of 1999 to approximately 100 cents per litre in the third quarter of 2000, an increase of between 25% and 30%.

There is **no information about the results of the increased price of petrol on traffic levels**. Furthermore, in February 2001 the excise **will increase** and the fuel price will rise at least two cents (2c) a litre throughout Australia.

Further information is required about future oil prices and its relationship to the number of vehicles.

## 3. No Relation to Other City Tunnels in Australia and Overseas

As I understand, there are no city tunnels in Melbourne, Perth, Adelaide, Canberra or Brisbane. There are some part cross city tunnels for example, in Paris, France, and Barcelona, Spain. However, there is **no detailed explanation of these other city tunnels** related to the high density (the inner part of Metropolitan Sydney is two to three times the residential density of other Australian residential suburbs).



**Further information** is required about similar inner parts of other Cities of the World.

#### 4. **Increased Air Pollution in Inner Metropolitan Sydney**

There is quite high air pollution in the inner part of Sydney, particularly in the inner west and south east. As you would know, there has been an increase in new apartments in the CBD, and close to the CBD in Ultimo and Pyrmont (approximately 30,000 residents), Green Square/Zetland/Alexandria (projected population of 25,000), as well as the recently rezoned Royal Alexandra Children's Hospital in Camperdown and the Women's Hospital in Paddington.

The Cross City Tunnel will increase air pollution from the eight(8) portals and the sub-main roads north, east, south and west. The EIS does **not address the effects of increased air pollution** combined with a recent large increase in residential density of these related suburbs.

This section of the EIS Cross City Tunnel should include the **effects of air pollution on Woolloomooloo, Potts Point, Kings Cross, Rushcutters Bay, Darlinghurst, Paddington, Surry Hills, Ultimo, Pyrmont, Darling Harbour, Chippendale and Glebe plus the City CBD (13 suburbs).**

There should be further information of a proper survey of air pollution in the 13 residential suburbs.

#### 5. **Increased Noise Pollution in Inner Metropolitan Sydney**

There are 13 suburbs close to the City Tunnels. Local vehicles to and from the tunnels and around local streets will lead to **increased noise levels.**

As in Section 4 (Air Pollution) above, a proper survey of noise pollution in the 13 suburbs should be carried out.

#### 6. **Projected Further Increased in Vehicles in Metropolitan Sydney**

##### 6.1 **Less use of Public Transport**

As stated in the EIS, it is likely that travelling east-west using the tunnels will be quicker than public transport (trains, buses and even ferries) to or from the city and inner Metropolitan Sydney. It is **unclear whether the proposed tunnel will lead to a reduction in public transport, or certainly not increase it.**

Further improvement in public buses in the City is discussed in Section 9. Furthermore, as shown during the **Sydney Olympics 2000** there was enormous support for public transport (see attachment – transcript of ABC Radio National “The World Today”, 28 September 2000). A new survey of public transport is required.

## 6.2 Possibility of the Impact of Further City Car Parking

There is **no information** about increased demand for **car parking** in and around the City for **full-time workers and short stay parking** for business people, shoppers and tourists. The City of Sydney Council has been pressing to introduce more car parking spaces in the City.

## 7. Short Construction Jobs Only with No long-term Jobs

As shown in the EIS, if the proposal is approved by the Government, construction could start during 2001 and finish in 2004. The EIS proposes 1600 direct and indirect jobs.

This proposal is a very small job increase over two(2) to three(3) years with no continuation. This proposal is for **short-term jobs only with very low maintenance** of the tunnels, compared with the jobs created by public or private transportation of trains, light trains (trams) or buses.

The State Treasurer needs to look carefully at this proposed Cross City Tunnel for short-term income with no further jobs.

## 8. Increased Cost of Proposed City Tunnels with New Payment Tolls

### 8.1 Further Costs of the Proposal

As discussed in the EIS, the tunnel will cost \$400 million, almost two-thirds (2/3) of the cost of the Eastern Distributor which opened in December 1999. But an additional 10% to 25% will be required for local road changes, landscape markings and increased maintenance because of increased traffic to or from the proposed Cross City tunnels. My estimate is \$40-100 million of State Government revenue and also further costs for Local Government Areas (City of Sydney Council, South Sydney Council and Woollahra Municipal Council) close to the proposed tunnels. There is **no clear information about the increased costs to the State Government or the three Local Government Councils near the proposed tunnels.**

## 8.2 Further Information on Toll City Tunnels in Other Cities

Further freeways should be **outside the Sydney area** – not having more ‘freeways’ in the inner part of Sydney with tolls such as the proposed **Sydney City Tunnels**. More information is required.

## 9. Increased Cost Local Roads and Maintenance will Reduce Public Transport

As discussed in the EIS, the tunnels will lead to an increased use of buses to and from the city. However, the recent increase in **bus lanes into the CBD** and **reduced number of bus stops** in parts of the city improves the speed of public transport. The proposed tunnel may not improve public transport in the CBD.

Furthermore, the State Government recently set aside \$40 million for increased maintenance on State Rail services. Some of the 10-25% required for maintenance as a result of the tunnels would be **better spent on improving public transport**. This information is not clearly stated in the public transport proposed in the EIS, such as new trains or light trains to the University of NSW, Kensington (30,000 students).

The Report on the Planning Scheme for the County of Cumberland NSW by Cumberland County Council Sydney 1948 proposed **1 to 8 expressways and regional roads**. Some of the expressways and regional roads have been constructed, such as the Warringah Expressway and the recently completed (1999) South-East Regional Road, but the North-Western Expressway and the Western Expressway, both through Glebe, were stopped in 1972 and similarly, the widening of Jersey Road and Barcom Avenue-Boundary Street (but will in the South Sydney Local Environmental Plan) has stopped and cannot continue. However, the EIS Technical Paper No. 3 Assessment of Need and Strategic Options (Vol. 2 Proposal Development) **still uses the Cross City Tunnel as a proposed 1950s Central Sydney Expressway or even a 1909 proposed Central Sydney Road Improvement**.

The proposed “Sydney Tunnels” called a Cross City Tunnel is regional because it has **wide impact on all transportation in Metropolitan Sydney**. The result of **more vehicles on more roads is not properly assessed in the EIS**.

## 10. Proposed Inquiry into the EIS of the Cross City Tunnel

There is either little correct information in the proposal or further information is required. As set out above, I ask that there be an inquiry before the State Government makes a decision on the Cross City Tunnel. It is important that the

inquiry has a **special Commissioner** from outside New South Wales who has a special understanding of transportation.

**Conclusion**

As set out above, there are a number of points which show that the necessity for the Cross City Tunnel is doubtful and should not be proceeded with.

I am happy to help with your assessment.

Yours faithfully,



Jonathan Falk  
Director

Attachment:

**Public Transport for Sydney Olympic 2000**  
ABC Radio National – The World Today  
12:37pm Thursday 28 September, 2000  
“Games spur change in public transport attitudes”  
(transcript – three pages)