Submission No 181

INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

Name: Mr Donald Robertson

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Attachments
Comment / Message
I write to object to the proposed Western Harbour and Beaches Link tunnels .
The current tunnel plans would not solve the problem of increasing travelling times for citizens. Throwing billions of taxpayer dollars at the building of road tunnels is not the best approach to the problem. It may result in a short-term alleviation of congestion, but the number of vehicles using any new tollway tunnel would gradually increase. Within a brief period, travelling times would return to what they are now and the only change would be a massive depletion in public funds, adverse effects on the environment, destruction of trees and publicly used green spaces and a nice profit for the private operator of the toll roads.
Better public transport is the answer. A metro or train tunnel would be a much better option than a road tunnel.
1. Emissions
Construction of the project would generate 784,000 tonnes of CO2 equivalent (CO2e). Diesel emissions during construction would be 42,083 CO2e (diesel is a group 1 carcinogen). The emissions total during operations by 2037 would be 1,035,968 CO2e tonnes per year, which is an additional 31,651 tonnes CO2e per year over and above not doing the tunnel. At a time when the state and the country must reduce its greenhouse gas emissions, this is not a positive move.
2. Waste
The amount of waste generated (much of it contaminated) would be 6 million tonnes of which 1.2m tonnes would be dumped at sea. The area of Sydney Harbour where soft sediment would be removed is 10.5 Ha. This dredging would occur at one of the most contaminated points of the harbour and have a massive impact on water quality and marine life in the harbour. Mitigation strategies outlined in the EIS for the tunnels are totally dependent on contractors doing the right thing. Where other options are available, they should be explored rather than blindly blundering into a high-risk project.
3. Biodiversity
In terms of the impact on biodiversity, the EIS for the tunnels identifies 26 threatened species in the project footprint and estimates 687 trees would be destroyed or impacted and 7.29 Ha of green space would be lost.
4. Water
A huge quantity of water would be required for this project. It would use 1.327m litres of water per day (including 837 kL of potable water per day). Public transport tunnels would require far less concrete and therefore far less water and would not require modifications to the Warringah Freeway.
5. Water quality
The project poses real risks to the water quality of Willoughby Creek, Quarry Creek and Flat Rock Creek. Soil tested in proposed dig sites has shown high levels of heavy metals (including lead), asbestos and nutrient concentration as well as microbiological contamination. The strategies outlined in the EIS for the tunnels do not adequately mitigate this risk.
6. Parks
Access to parks in Birchgrove and on the north shore would be restricted during the proposed construction and over seven hectares would be lost forever. Parks would also be impacted by dust, noise and vehicle emissions from construction vehicles. Removal of green space and over six hundred trees and the addition of more concrete surfaces would add to urban heating.
7. Ecologically sustainable development
Despite the claim that 'the principles of ecologically sustainable development have been an integral part of the design and assessment of the project', I strongly disagree that the proposed project meets the four principles set out in the Protection of the Environment Administration Act 1991 (NSW). Specifically:

a) The precautionary principle has not been met in terms of the sensitivity of the foreshore environments, the contamination risks or the construction methods proposed. Critically, no public transport alternative has been prepared.
b) Intergenerational equity is not achieved because future generations in the areas affected by the project would have less green space, more car use and higher levels of congestion and pollution.
c) Biological diversity and ecological integrity are put at significant risk rather than being maintained.
d) There is no evidence of improved valuation and pricing of environmental resources. In fact, the proposal to place an unfiltered pollution stack and create more traffic in and around parks would significantly devalue these resources for the community.
8. Traffic
The proposed project does not demonstrate a net improvement in traffic outcomes across the area. In Willoughby were I live, I would lose connectivity and traffic volumes would significantly increase on the already congested section of Willoughby Road heading north between the Naremburn exit from the Gore Hill Freeway and Mowbray Road.
9. Infrastructure Australia priority list
The WHTBL project sits amongst 32 other projects in the bottom category of the Infrastructure Australia list. Infrastructure Australia has earmarked it as a possible priority under the condition that a valid business case be submitted for assessment. The business case relies on assumptions about traffic volumes that are demonstrably out of date. A revised cost benefit ratio should be prepared and the government should publish the base-case financial model. This is public money that it is playing with after all.
There are 16 other higher priority projects in NSW many of which have assessed business cases and several of which are located in Western Sydney and regional areas – areas that most need the government's investment following drought, bushfires and the impact of COVID-19.
10. Air quality - unfiltered pollution stacks at tunnel exit points.
There are expected to be three pollution stacks in the North Sydney area, which is the largest education district in the state (there are 21 schools within the North Sydney council area). Anzac Park Public School (APPS) is already next to a 10 lane freeway. The school is currently impacted by the pollution of a 375m stretch of those 10 lanes (from the Ernest St overpass to the Miller St overpass). So currently (pre-stacks) about 3.75km of polluting road.
The two pollution stacks that are expected to be built for the Northern Beaches tunnel and the Western Harbour tunnel would pump out 7km x 3 lanes each. They would both be located (per Roads and Maritime Services advice) within the 500m impact zone. So that would mean an additional 42km of polluting road impacting the schools directly. In other words, there would be more than 12 times the current pollution impacting these children. Or put another way, the school might as well be next to a 120 lane freeway!
Cammeray Public School is in the impact zone of one of the stacks. They might as well be next to a 60 lane freeway. It is the same for the new local high school, Cammeraygal.
As a member of this community I object to this lack of safety & planning
Thank you for considering my submission.
Donald Robertson

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