

Submission
No 231

**INQUIRY INTO IMPACT OF THE WESTERN HARBOUR
TUNNEL AND BEACHES LINK**

Name: Name suppressed

Date Received: 18 June 2021

Partially
Confidential

17th June 2021

SUMMARY:

This is a personal submission but much of the research was undertaken as part of my role as [redacted] This group is referenced in the body of my submission and correspondence. [redacted] is part of the [redacted] and is a volunteer committee run (by residents) under the auspices of North Sydney Council.

I submit that the WHT and Beaches Link Tunnel proposals do not comply under the following **terms of reference** listed in the inquiry.

- a) **substantially inadequate**
- b) **substantially inadequate**
- c) **inadequate**
- f) **substantially inadequate in scope and operation**
- g) **substantially inadequate as conducted during/throughout the COVID-19 response.**
- h) **Costs (projected, real or estimates) should be transparent and demonstrated.**
- i) **Distinct lack of transparency and proper engagement. Including failure to enter into specifics on traffic modeling, projected junction failures and severe disruption to local roads in North Sydney.**
- j) **Inadequate consideration especially in regard to ventilation stack pollution.**
- k) **Substantially vague and inadequate - especially enforcement or penalties for breaches in conditions during construction.**

I include in this submission my previous correspondence with TfNSW, NSW Premier - Gladys Berejiklian and the Minister for Planning - Robert Stokes.

Written in 2020 I believe that the points raised (providing a critique of the Western Harbour Tunnel EIS) have not changed in any substantial way vis a vis the negative effects of both tunnels.

I submit that the business case has not been examined or explained nor the expected impacts addressed or alleviated.

In addition it was a major failure to not consider other options like rail (or rail and road) and a complete failure to properly assess and/or effectively model the impact on North Sydney local roads and traffic. Surely a "ground zero" for an Environmental Impact Statement?

I welcome this inquiry and a more thorough and vigorous examination of the key criteria outlined in my previous submissions.

Thank you for conducting this essential inquiry.

Main OBJECTIONS

I **strongly object**, for multiple reasons, to the WHT – EIS.

Due to the length of the 9000 page document I found it necessary to break these objections down into sections. I will be copying each of these to my local MP (who is also the NSW State Premier) and the main person responsible for attempting to push through a wholly retrograde and inadequate design.

1) Unfiltered Ventilation Stacks.

I **strongly object** to the use of unfiltered ventilation stacks in North Sydney and Rozelle.

The type and location is such that this vent system will be a significant multi-generational health risk. To attempt to push ahead with such an antiquated system, when it is so close to wider North Sydney, schools and recreation, is social and perhaps political suicide.

Australia is a long way (25 plus years) from an electric “clean car evolution.”

The proposed tunnel is excessively long for the type of ventilation you are attempting. This is not international best practice in design or stack ventilation proposals.

I **object** because the longitudinal ventilation proposed is known to be inadequate to control in-tunnel pollution and facilitates air quality problems for tunnels which are longer than 4km.

I **object** to this EIS because it ignores the recommendations on filtration for new tunnels made by the 2018 Joint Parliamentary Inquiry into WestConnex. Specifically this needs to be addressed and explained.

I **object** to the EIS because it will be more expensive (and an inherent design flaw) to have to retro-fit filtration after the fact. The current design does not have any capacity to retro fit.

“Trials” and retrofitting has already occurred in other nearby NSW road projects. Lets avoid the embarrassing political climb down and extra needless expense from the outset.

I **object** due to the deliberate under estimation of pollution levels in the EIS.

Australia has not adopted the Euro6 fuel standard, which the modelling is based upon. There are a significant number of cars, commercial diesel trucks/haulage and cars with catalytic converters which have done more than 60,000 km which pollute well beyond Euro6 standards. All suburbs in the North Sydney LGA are modelling to have increased air pollution levels. Many already exceed the Australian standard. You need to do much better on this - not magnify the issue.

I **object** to the lack of any filtration because the World Health Organisation has declared that outdoor air pollution is already a leading environmental cause of cancer deaths. Located **directly** beside the stacks are at least 3 major schools, with

many more nearby. There are also Tennis courts, a skate park, a golf course, a playing field, cycleways, 2 parks and a community garden. Who will want to play sport and gasp in pollutants venting from one 7km tunnel *plus* the Warringah Freeway?

The Beaches Link Tunnel EIS is not even available yet to assess the impact of a **second** long tunnel venting in the same location. My own children attend schools which will be directly effected by the increase in pollution.

I object because there is no plan to manage the consequences (noise, dust, vibration etc.) of 6 years of heavy plant construction.

Noise sheds may cover the direct boring - but what of the planned 500 truck movements per day? A solid and "conditioned" proposal needs to be drawn up with further consultation before being signed off by the community. This is crucial given the number of schools, childcare, hospitals and nursing homes in the area.

I object because as we have seen this summer increasingly unpredicted weather events can trap smoke, dust and pollutants in the lower atmosphere. If (when) there is a repeat of the bush fires the vent stacks will not be distributing into the upper atmosphere as assumed. More work and study and information needs to be provided.

I object to the design, size and scale of the proposed machinery sheds for the vent stacks. These are 4 storey and have been placed **underground** in Rozelle.

Nearly 3 hectares of Crown Land will be lost under this proposal. This is unacceptable. There should be no "net loss" of green space in North Sydney at the conclusion of this project.

Measures to mitigate the damage

A formal CONDITION of any approval for the project will insist on the following:

- **Full air filtration on all ventilation stacks**
- **Place the machinery for the ventilation stacks underground in Cammeray as has been proposed in Rozelle. Remediate to parkland above.**
- **Use the international best practice filtration techniques needed to handle heavy trucks and diesel vehicles that are being diverted off existing roads.**
- **Install tranverse treated particulate filtration through tunnels (not just at the end in the stacks)**
- **Use truck convoys so that individual streets can be opened (and closed) at reasonably predictable and nominated time, enabling local residents to plan accordingly.**

- **Continuous Noise monitoring and assessment within set/approved parameters and times.**
- **Providing shuttle bus transport to work site and designated on-site parking for workers so local businesses and residents have access to on street parking.**
- **Proper governance, reporting, oversight and requisite penalties for breaches of conditions of consent (noise, vibration, hours, truck movements and routes, parking etc.)**