

Submission
No 426

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

Name: Name suppressed

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Partially
Confidential

Inquiry into the Western Harbour Tunnel and Beaches Link Project
Public Works Committee
Legislative Council
NSW Parliament
Macquarie Street
SYDNEY NSW 2000

To whom it may concern,

**Parliamentary submission AGAINST Western Harbour Tunnel and Beaches Link
Tunnel**

Thank you for conducting this important inquiry, a much needed effort to gain greater transparency and better outcomes for those affected by these Projects.

I write to you as a very concerned local parent of a child attending Anzac Park Public School with a younger sibling to follow in the coming years. The government created a state of the art educational environmentally friendly institution that can cool/heat itself easily through the use of large windows and fans. This design now leaves over 900 children, including my own, extremely exposed to the external air and noise pollution that will be caused by these tunnels not just during construction but ongoing through unfiltered air stacks.

For the reasons, I have outlined below linked to the parliamentary terms of reference, I believe there is **insufficient reasons** for these tunnels to go ahead. They will cause significant destruction to the local area and will have ongoing health and safety ramifications for no publicly available documented benefit. Whilst I can appreciate the need for improved transport this should not be at the expense of safety and quality of life.

(a) the adequacy of the business case for the project, including the cost benefits ratio

Despite numerous requests, including a petition of over 10,000 signatures, the government has not disclosed the business case for these tunnels to the general public. If there had been disclosure, we would have had the opportunity to review their view of the benefits and liabilities of all the options and be in a position to have been adequately consulted. As it stands there has been a total lack of transparency, disclosure and consultation on the business case.

Due to this lack of transparency, we can only respond to the benefits listed in the Environmental Impact Statements. The below quoted benefits are completely untrue for residents of the lower north shore, like myself:

- The Beaches Link Tunnel will NOT reduce congestion. Our roads and direct routes for our commute are to be shut off and our local streets flooded with up to 2000 vehicles an hr trying to make their way from the 6 lane motorway to their final destination along single lane streets.

- Returning the local streets to locals: The current design most certainly does not do this to residents of Naremburn and North Sydney. Our streets are to be flooded by motorists through a limited number of on and off ramps that will just cause congestion. Congestion that will result in rat running and pose further dangers to locals.
- Contribute to an integrated public transport network: This design is removing the Miller St bus interchange and is not providing for any further public transport options.
- It will NOT reduce our commute to the CDB or beach. The limited access on ramps and off ramps to our local community will make our journey more convoluted and in the case of the beaches link will not even deliver us to the beach, finishing in North Balgowlah. This may provide some temporary relief to the residents utilising Military road, however, not in the long term as commuters will soon realise the cost of the toll does not support the benefit when they only end up on the other side of the Spit Bridge.
- It does NOT provide a long term solution. All motorways in and around Sydney have had to be extended or modified within years of opening as there is no way to adequately provide for growth and result in significant traffic jams.

(b) the adequacy of the consideration of alternative options

The only documentation provided to the community have been the Environmental Impact Statements. These documents have been over 900 pages long and not easy to consume. This aside the community has rallied together to review.

In the case of the Western Harbour Tunnel, there is little included in relation to alternative options. There are oblique references for a poorly researched public transport option that read as an afterthought with no detailed analysis and costing.

For the Beaches Link no further options were noted.

The request to consider a public transport option was included in a large number of community objections to the project, yet still a detailed alternative option has not been tabled.

In a time of increasing climate change, the lack of consideration of a public transport option is astounding, especially considering the enormous cost and destruction required to complete the project. The usage numbers of the BLine and the recently opened Metro clearly show our communities preference for public transport. Transport plans as far back as Bradfield's transport plan in the 1920's shows that a tram running across two laneways of the bridge would carry more people than the bridge does through its six lanes now.

(c) the cost of the project, including the reasons for overruns

This project will take a number of years to be delivered at great expense with no indication of how it is intended to be funded. Preparation costs are already in excess of \$150 million and construction is reported to be \$16 billion.

The benefits to cost ratio is not stated in the Environmental Impact statement so I can only assume it is low.

The benefits from this exorbitant investment are only noted in saved commute "minutes", however, with out much indication of who will be saving these minutes. The changes, certainly to our local roads, will greatly increase our commute times, not only by road but also to bus commuters who are having bus stops and routes changed due to the changes. As with all

toll roads, these benefits will be incredibly short term, yet, unlike other motorways, we cannot just easily add an extra lane to a tunnel under the ground/water.

The costs of this project will go way beyond the construction costs.

The tunnel design incorporates unfiltered smoke stacks, the positioning of which has only been made worse from the initial proposal to final design. Where initially, the two stacks were to be placed at either end of St Leonards park, we are now placing both unfiltered stacks right on top of Anzac Park Primary School. Particulate Matter (PM) in our local area, due to its proximity to the Warringah freeway, is already higher than what is recommended or considered “safe” by your own government organisations. The two unfiltered stacks will greatly increase the level of PM. Anzac Park primary alone, home to over 900 students under 12 years of age will be subjected to the biggest particulate matter increase over the hr and will exceed 2037 for both PM2.5 and PM10 over a 24-hr period if the beaches link is allowed to proceed alongside the Western Harbour tunnel. Research has shown that the concentration of pollutants that would be caused by limited exit points from a 10 lane tunnel increases the risks of asthma, lung cancer and stroke. This has been proven in data collected for the Hazelwood fire disaster which notes the impact of pollution on children with regards to health and emotional wellbeing. Subjecting young developing lungs to such high levels of pollutants will have a flow on affect on the costs for the health system.

There is also a large opportunity cost. Infrastructure Australia rates the Western Harbour tunnel as one of its lowest priorities with 59 projects rated higher. As an independent statutory body they provide research and advice to government on how best to fill the infrastructure gap, yet this is being ignored. As a result, eight high priority and 22 priority projects for NSW are not being completed.

(d) the consideration of the governance and structure of the project including the use of a ‘development partner’ model

As with the business case, with regard to the consideration of other options and costs there is little to nil disclosed as to the governance and structure of the Projects nor the use of development partners (we assume you are referring to the Government co-opting others to either assist with the financing or way the Projects are delivered) so it is hard for us to be able to comment on those aspects.

The provision of information in clear, concise and easily digestible terms for this and other aspects would be greatly appreciated and assist in assessing whether the Projects are really any good.

(e) the extent to which the project is meeting the original goals of the project

The marketed goal of these projects was to substantially improve the flow of traffic across the harbour. In achieving this goal the project has not factored in the affects on local traffic in North Sydney, Inner West and Northern beaches whose local streets are being affected.

As outlined under section a) the building of these tunnels will greatly increase local congestion and in fact increase our commute times both across the harbour to the CDB and beyond; to the beaches; and in conducting movements around our local area. In addition to the longer

commute times the project will create a number of rat runs through our local streets posing further safety risks.

So from where we are sitting, the project most definitely is not meeting its goal. The affect on the lower north shore where we reside will be exactly the same for residents of the Inner West.

(f) the consultation methods and effectiveness, both with affected communities and stakeholders

Community consultation has been limited to a tick box exercise. Information sessions have been limited to one way communication from Transport for NSW telling the community what they were doing, not answering questions and not altering their position even in the light of widespread opposition.

Despite an enormously large number of objections being filed against the EIS's there has been no change that addresses community concerns, with the exception of moving the smoke stack that was to be on the south side of St Leonards park to sit next to its counterpart right on top of Anzac Park Primary. Whilst this may have placated some objectors with children attending the North Sydney private school, Wenona, it just made the situation twice as bad for those utilising the public school system.

(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio

The COVID pandemic has created a shift in the way the community conducts their lives, particularly where we work with many people now working from home. This further exacerbates the impact on local residents in terms of noise and air pollution post during and post construction.

Also the pandemic has reduced immigration and travel to this country to nil, which will take years to recover to pre-pandemic levels if it ever does.

We assume (noting the Government has not provided the cost benefit ratio to the public) the cost benefit ratio is based on pre-pandemic work, immigration and travel arrangements which would have involved far greater levels of travel by the community, which in turn would have added to the positive side of the ratio (the time saved by all those people in travelling through the new tunnels) adding to a total which justified the Projects.

As things have changed dramatically and we would argue permanently the Government needs to redo the cost benefit ratio calculations taking these changes into account and we then see if it is still a positive go forward scenario.

(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the project and its component parts

With such a large funding envelope and enormous detrimental impact on the community the Government should most definitely provide more information to the community so we can understand how this impact on us is warranted.

(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body

There is absolutely no transparency or accountability for these projects. This is completely incongruent given the financial and human cost involved. Process is being ticked off with information sessions and EIS feedback with no demonstrable changes being made. Despite making numerous objections to the project outlining my concerns and their impact on my young children, I have had no response from the project outside of a pro-forma thankyou for submitting your concerns. Even as recently as last month, I wrote to the Project and the Minister voicing my concerns in relation to the Warringah Freeway upgrade work that will result in a worksite at the top of Rosalind street and numerous trucks crossing over my young child's commute to school. Whilst I understand from the school that some restrictions have been put in place (as they were also raising concerns), the project have not responded to me.

We should not be left to hear updates through selective media updates. The Governments needs to be transparent and accountable and provide clear concise digestible information to the public. The absence of this just supports the communities view that these project are unfounded.

(j) the impact on the environment, including marine ecosystems

There will be grave environmental impacts from this project and a significant reduction on our local green and sport facilities.

Construction at Flat Rock Gully will:

- Destroy wildlife that has taken 25 years of hard work to rehabilitate and is now a vibrant green space area highly utilised by the community. Flat Rock Gully is a critical part of the wildlife corridor is recognised for its biodiversity. It is considered one of the last refuges for our fast disappearing small native bird population and provides a habitat for foraging powerful owls, swamp wallabies, lyrebirds and many other native animals.
- Unearth years of buried asbestos, lead and toxic odours as the previously long buried old tip and quarry will be dug up increasing the risk of health impacts.
- Remove Sports and community recreation facilities and walking/cycle paths will be subjected to unsafe levels of construction dust particles and air pollution.

Further, the design will make a significant part of Cammeray Golf Club unusable. Cammeray's all-weather football pitch, skate park and tennis courts will be affected by noise and air pollution and may not safe to use for the duration of construction.

Finally, Harbour dredging will impact water quality and the marine eco system and will most likely result in the local swimming baths at Northbridge being forced to close. The Government is taking short cuts with the tunnel crossing, constructing the tunnel to sit on the harbour bed rather than underneath which will have an permanent impact on the health and wellbeing of marine ecosystems. Years of toxic materials which have settled on the harbour floor will be mixed through the harbour waters creating environmental havoc to the harbour areas from which there will be no recovery. The fact that, the metro has been placed

underneath the harbour bed for exactly this reason further highlights the lack of adequate consideration of the impacts of this project.

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally

As I highlighted under section c in relation to the costs, the unfiltered stacks incorporated into the tunnel design will vastly increase the level of particulate matter exposure, and potential for increased health costs due to positioning of these stacks adjacent to Anzac Park Primary holding over 900 young developing lungs. The impact analysis of this has been completely inadequate and needs to be revisited.

Modelling in the EIS with regards to air pollution from these stacks claims that the pollution will be redistributed as a result of the project. It does, however, fail to highlight that the positioning of the stacks in fact creates a key corridor of pollution along Ernest St/Military Road directing affecting 26 local schools. Anzac Park Primary alone, home to over 900 students under 12 years of age will be subjected to the biggest particulate matter increase over the hr and will exceed 2037 for both PM2.5 and PM10 over a 24-hr period if the beaches link is allowed to proceed alongside the Western Harbour tunnel.

The environmental impact study makes a number of other flawed assumptions with regards to the impact of these smoke stacks:

- The impacts have been calculated based on an assumed number of people impacted. This assumption has not provided for the over 900 students attending Anzac Park Public School right next door to the stacks, nor has it factored in other schools and day care populations within the 150 metre radius. Further, it has understated the resident population by not taking into account the large number of unit block residences in the area.
- An assumption is made with regards to the rate of air disbursement which does not take into account the large number of high-rise buildings in the North Sydney area that would inhibit this.
- Modelling is based on certain events occurring which are not guaranteed as well as comparing a 15 km 6 lane triple one mid location tunnel servicing up to 4.3 million cross harbour trips a week and a population of 5 million with a city 1/5 that size, with 75% of new car sales being electric vehicles and pollution stacks every less than 5 km.

The study has also been made based on 2016 traffic data and has made no provision for the fact that the base level of pollution that these stacks would be adding to a level that is already on the rise due to the effects of climate change. Further, the increase in temperatures and lack of the afternoon southerlies is no longer clearing the air through overnight.

The health and safety risks are further compounded by the length of the tunnel. The proposed Western Harbour Tunnel and its linkage through to the Beaches link is the longest unfiltered tunnel in history. The environmental impact statement has made no adjustments in its calculation on the affect on our community by this increased length and the consolidation of the exhausts through such a small number of smoke stacks that are not spread out.

Anzac Park School has been requesting the project to have EPA approved air quality monitors installed now so that the impact of the unfiltered smoke stacks can be accurately assessed yet all discussions are continually deferred. Transport for NSW instead is opting to place a monitor near Cammeray golf course. If our community analysis with regards to the impact of these unfiltered smoke stacks is wrong, what do they have to hide in getting accurate measurements?

In addition to the ongoing health risks highlight above, we will also be subjected to years of construction. The building of the tunnels will subject local residents to 5-6 years of traffic chaos with heavy diesel vehicles moving through and idling in local streets. This will not only increase pollutant levels, posing further health risks to locals, but also safety issues.

Road safety is a major concern, especially for our young children. At least 70 trucks an hour will travel along residential streets. The project focuses on allowing direct access from Flat Rock Drive to the Warringah Freeway, keeping trucks off local streets. To reach the Warringah Freeway, trucks must travel along Brook Street. Due to school zoning, primary school students in Naremburn must cross Brook street to walk to Cammeray or Anzac Park Public Schools.

Noise pollution will also be a permanent, 24/7 problem. Trucks, drilling, ground work and preparation activities will mean noise along and around the construction corridor. Noise travels. It will impact residents, students and local businesses. It affects sleep, concentration, stress levels and health. The proposed noise sheds will not eliminate this noise pollution.

Finally, our community will be flooded with a number of construction sites holding dangerous goods. Of particular personal concern, is the usage of Cammeray Golf Course to hold the explosives for tunnel construction which is within a stone's throw of Anzac Park primary school.

(I) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths

Public and First Nation Sites need to be preserved at all costs. The preservation of these sites has not be considered and needs to be reviewed.

Further, the project will affect local recreation and sporting facilities. Construction planned at Flat Rock Gully only will:

- Remove the recreational enjoyment of the parkland areas with Wildlife being affected as well as exposing any person utlising what little green space will remain to years worth of unearthed asbestos, lead and toxic odours as the previously long buried old tip and quarry will be dug up.
- Remove Sports and community recreation facilities.
- Walking/cycle paths will be subjected to unsafe levels of construction dust particles and air pollution.
- Northbridge swimming baths will become unusable with the amount of toxins being unearthed through the digging.

Further, the design will make a significant part of Cammeray Golf Club unusable. Cammeray's all-weather football pitch, skate park and tennis courts will be affected by noise and air pollution and may not be safe to use for the duration of construction.

My ASK

For the sake of my children's future and the next generation I sincerely ask you to reconsider and work in the best interests of all. If you can't find a way to considering a sustainable public transport option then I beg you to at least do what can be done to protect the children by:

- a) Filtering the smoke stacks in line with world best practice
- b) Moving construction sites away from public schools and implementing strict controls of all forms of pollution (dust, noise etc) from whatever source during the construction of the Tunnel
- c) Taking a more controlled approach for the movement of traffic to reduce the impact of congestion and rat running
- d) Remodelling harbour work to consider the data used by the Sydney Metro construction on the affects of dredging.

Thank you for reading my comments and I look forward to hearing your deliberations and decisions on the Projects.

I do not wish our personal details be disclosed in the course of your inquiry.

Regards,