

Submission
No 451

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

Name: Name suppressed

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Partially
Confidential

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OBJECTION TO THE BEACHES TUNNEL & GORE HILL FREEWAY UPDATE

I as a parent of Anzac Park Public School children, object to the Beaches Link Tunnel and Gore Hill Freeway Update Project for the following reasons:

1. *The Need for the Project*

The EIS does not set out a positive reason for this Project that outweighs the negative impacts and other options for the community.

The relatively small reduction in motor vehicle travel time as set out in the EIS is not enough to justify-

- i. the multibillion-dollar expense
- ii. the effect of the pollution from the pollution stacks to be constructed on local communities including schoolchildren
- iii. the effect on the climate
- iv. the loss of green space
- v. the irreversible degradation of Sydney Harbour in two locations, and the adverse effect on local flora and fauna
- vi. the traffic chaos for the local communities where forced changes have been made to local roads to force use of the Tunnels by the communities.
- vii. substantial air and noise pollution during construction
 - when there are other options-
 - a. a proper and comprehensive public transport system
 - b. filtration of pollution stacks

The EIS needs to address these issues.

2. *No Business Case*

The EIS does not set out in any proper and detailed way-

- i. the business case for this Project

- ii. the business case for other options including a proper and comprehensive public transport system and pollution stack filtration

With the level of adverse impact and the amount of money involved the EIS should include proper and detailed business cases for all the relevant options including what is currently in the EIS.

3. Health & Safety

a. Filtration

The EIS, as with the Western Harbour Tunnel Project, relies on reports from the NSW Chief Scientist (NSW CS), committees related to the NSW CS and the NSW Chief Medical Officer which are flawed and/or qualified, and therefore of little true value in determining the question of filtration, in particular-

- i. these reports compare different tunnels, using short tunnels to justify the lack of filtration to these lengthy Tunnels, comparing 'apples' to 'oranges'
- ii. most reviews of overseas tunnels have been 'desktop' comparisons/reviews, not real world on site observations.
- iii. the reports imply some new tunnels are not filtered when they are, eg the new tunnel in Hong Kong.
- iv. the reports do not mention 'like for like' tunnels. The new Norwegian unfiltered tunnel is not mentioned. It has stacks every less than 5 km of the tunnel (noting also the traffic using that tunnel would be a fraction of these Tunnels) whereas with these Tunnels it is every 7.5+km (6 lanes of traffic). If these Tunnels met that criteria there would be at least two or more stacks including one on the North Sydney foreshore and one in the middle of Mosman.
- v. these reports assume the country will have Euro 6/VI emission standards, it does not and there is no mandate for any change within the foreseeable future.
- vi. there is no accounting for/mention of the recent court case in the UK which is a precedent for us, where the court decided motor vehicle pollution contributed to the early death of a child.

Therefore given the flawed qualified nature of these reports which form the basis of the 'science' underpinning the justification for these Tunnels, the proponents of the Project need to go back, get proper reporting and review the EIS, in particular the filtration of the pollution stacks.

b. Construction

As the construction centre (Cammeray Golf Course) for the Project is within 300m of the School, if the Project proceeds notwithstanding the issues raised then proper steps need to be taken to protect the School's children and staff in particular-

- i. ensuring dust pollution is completely suppressed
- ii. ensuring no heavy vehicles travel anywhere near the School including Ernest Street, Anzac Park Avenue, Rosalind Street, Miller Street and M1 Miller Street off ramp during the hours of 7am and 5pm school days.
- iii. suppress all construction related noise during school days to ensure teacher and schoolchildren including those with autism and other attributes are not adversely affected by noise whilst they are teaching/learning.

None of these requirements are set out in the EIS and need to be included to ensure ultimate compliance by contractors.

c. **Climate Change**

With the ever increasing need to work towards a net carbon neutral/zero future it is incumbent on Government and others proposing infrastructure projects to ensure those projects minimise their impact on climate change.

This Project does none of that, when filtration of pollution stacks can reduce the impact on the climate the proponent prefers to allow the current excessive emission position to remain and be added to by the pollution out of the pollution stacks.

The EIS is looking backwards not forwards in relation to climate impact at a time when that type of thinking is totally wrong, therefore a review and rethink is required by the proponent.

4. Traffic

The restrictions and changes to the flow of local traffic to force the use of the Tunnel adversely impacts those in the local community who have added congestion and time to their local trips due to these changes. These changes also create rat runs where local residents are adversely affected by increased road usage by people seeking to avoid the Tunnel.

If progressing the EIS needs to be reworked to better ensure the adverse impact to local traffic and local homes is minimised.

5. Green Space

There is limited green space in the North Sydney area (lowest per capita in the country) and lower Beaches area and that is further reduced by the permanent removal of portions of Cammeray Golf Course, Anzac Park and St Leonards Park.

If proceeding either replacement green space be provided or the Tunnel maintenance facility being built underground needs to be added to the EIS.

6. *Wrong Thinking at the Present Time*

The proponent is out of step with the current thinking for the future of this Planet.

Where the proponent should be taking steps now to invest in steps to minimise the effect of carbon and other emissions on our Planet by opting for a comprehensive public transport system, or if not that filtering the pollution stacks, they are not, there is no proper public transport option provided and no filtration of pollution stacks.

The EIS needs to be reviewed and reworked to incorporate essential reductions in all types of emissions to give the Planet a chance to survive.

7. *Waterways*

The construction of the Tunnels creates significant adverse disturbance to the local waterways which creates devastating consequences for the community and local flora and fauna for years to come.

None of this is properly outlined in the EIS, it needs to be amended to include how the proponent will avoid that adverse long term impact.

8. *Consultation*

There has been little to no communication from the proponent in a form that one would call a 'consultation'. Presenting a slick short meeting where part of what is happening and its impact is/isn't disclosed with legitimate questions either not being answered or deflected, cannot be called 'consultation'.

Before any further progress is made with the Project, proper infrastructure related consultation with all stakeholders is required.

9. *Conclusion*

The EIS needs to be reviewed, reworked and amended to include-

1. a proper costed business case
2. costed business cases for other options including a public transport system and filtration of pollution stacks
3. provisions which create substantial reductions of all types of emissions in line with current thinking to save our Planet
4. filtration of the pollution stacks
5. strict controls of all forms of pollution (dust, noise etc) from whatever source during the construction of the Tunnel to minimise adverse impact on the School community
6. better traffic changes
7. more green space

8. proper protection of the waterways and their flora and fauna
9. proper consultation with all community stakeholders before any further progress