

Submission
No 467

INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

Organisation: Naremburn Progress Association

Date Received: 18 June 2021

17th June 2021

The Hon. Daniel Mookhey MLC
Chair
Public Works Committee
NSW Legislative Council
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Naremburn Progress Association

Submission to the Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link

Dear Members of the Public Works Committee,

Naremburn Progress Association has been in operation continuously since 1901. Our association has represented our historic suburb and the wider area in matters related to other major road projects and even the building of the Harbour Bridge. Despite its local heritage status, substantial built, social, natural and Aboriginal history this suburb, that sits between North Sydney and Chatswood, has been repeatedly and adversely impacted by road projects such as the Warringah and Gore Hill Freeways. A large section of land was lost to these freeway projects and the suburb was effectively cut in half. As a result, the area has suffered from dislocation, pollution and traffic however a strong sense of community and awareness of the need for historic preservation remains. Naremburn was one of the first suburbs settled on the North Shore and played home to the first planned shopping street, early bridges, original homes, farms, factories and trams. The suburb which retains many original dwellings today is increasingly being encroached upon by significant high-rise development and impacted by traffic. Naremburn borders the deep gully of Flat Rock which was once home to the Cammeraygal people, was turned into a residential and industrial tip site and then recovered. Naremburn Progress Association was instrumental in the closure of the tip and the remediation of the area – today the area is returned as a key urban wildlife corridor and heavily used recreation area.

Naremburn Progress Association is also a member organisation of the Bicentennial Reserve and Flat Rock Gully Advisory Committee which advises Willoughby Council regarding this precious and unique area – non-council members of the committee made a submission to planning, which is attached for your information, related to the terms of reference. In particular, the under assessed risks associated with the Flat Rock Gully dive site.

It should be noted that the substantial history of the area has been accepted for review by the National Heritage Committee – notification attached.

Naremburn will be adversely impacted by both stages of these projects. The Warringah Freeway “Upgrade” will extend into Naremburn where noise and other construction impacts will have a detrimental impact. The Beaches Link tunnel is due to pass directly under the area of greatest historic significance in Naremburn – the EIS demonstrates that drawdown and vibration will be a considerable risk. The Major Temporary Dive site at Flat Rock Gully is an old tip site which according to EIS documents has not been fully tested. Historic and anecdotal evidence confirms that this was a deep and extensive site which was hugely problematic to contain given the location in a substantial catchment area where there are large volumes of overland, estuarine and groundwater flows. We know that it was not simply a household rubbish tip as some areas of the EIS claim. Asbestos, refrigerant and even medicines from the Royal North Shore Hospital were dumped there. Settlement continues and it is not clear if the tip is still gassing. Opening up the tip at the eastern (downhill) end at the edge of the old growth forest, within this catchment and in and around Flat Rock Creek

holds obvious implications. The risks associated with contamination spread are well identified but under tested in the EIS. Given that the catchment runs out into Middle Harbour it may be more than simply the surrounding suburbs, sports fields and bush that is put at risk by such a proposal. In addition to the risks around contamination, 70 trucks per hour are predicted for Flat Rock Drive (which was temporarily put in as part of earlier expressway works) and which leads out of Flat Rock through residential areas with a high density of children. This is a major school route for children of Naremburn who are zoned to move across Brook St to attend multiple schools.

We strongly object to the Western Harbour Tunnel (including the Warringah Freeway Upgrade) and Beaches Link (including the Gore Hill extension) projects and urge you to recommend that the NSW Government stop these destructive and wasteful projects immediately.

We have previously submitted detailed reasons as to why we have objected to these projects. Please find attached these submissions. The submissions relate to the following terms of reference in particular:

(a) the adequacy of the business case for the project, including the cost benefits ratio (however given the business case has not been released this cannot be commented on in full). We have requested details of the business case on numerous occasions in the past but to no avail, with any case being refused issue as Cabinet In Confidence. GIPA requests were also lodged, but any documents released were so heavily redacted as to be rendered useless.

(b) the adequacy of the consideration of alternative options. Right from the initial release of plans for these projects the community has been asking for details of alternative options considered, especially public transport options. Our requests were quite simple: what other options were considered and why were they rejected? Responses to date have been somewhat perfunctory.

(c) the cost of the project, including the reasons for overruns. Cost Blow Outs: Issues to consider include untested tip site, cost to manage high impact construction in dense residential areas and school zones, variability and uncertainty of marine environment, ongoing sewage and subsidence issues due to works in Naremburn (see Attachments G & H, which note correspondence between a local Ward Councillor, Willoughby Council Officers and the local MP, our Premier), potential clash with Northside storage tunnel, Dive site in large catchment area in an old industrial and residential tip, large drawdown impacts predicted together with costs to the environment and historic residences. All these issues could drive substantial cost overruns, but have not been properly considered in the analysis.

(e) the extent to which the project is meeting the original goals of the project. Whilst the original goal of the project was to reduce congestion, the solution should never have been to simply build another road. An open and transparent analysis of the real alternatives would have provided a more equitable solution.

(f) the consultation methods and effectiveness, both with affected communities and stakeholders. Naremburn was not part of the consultation with regard to scoping the project and was not allocated a dedicated consultation session with regard to the EIS. Consultation was difficult during COVID as sessions were held online and were constrained to certain areas. Whilst the Dive Site was discussed during the session, issues pertinent to Naremburn were often deemed outside the scope of discussions. Furthermore, a request for extension due to the difficulty in engaging with the 12,000-page Beaches Link EIS during the pandemic was denied. Consultation and representation has also been less than satisfactory with our local member who at a recent meeting stated that the outcomes of the project would be positive in terms of traffic, pollution and travel times despite the EIS demonstrating that there are less than positive outcomes for Naremburn and the surrounding area in regard to those issues. The community has sent numerous communications to the local member however there has been a seeming lack of engagement with regard to the issues raised. Our local member also was unable to accept and present a local petition that gained 11,000 signatures. The response by the government and particularly local North Shore member to the petition was very disappointing considering most of the signatures came from Willoughby and the North Shore.

(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. Work and travel patterns have fundamentally changed due to COVID-19 impacts, with a significant proportion of the workforce now working from home on either a part-time or full-time basis. Traffic modelling has been conducted on data which is generally several years old, whilst no review has been attempted to update outcomes which reflect post-pandemic effects.

(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts. Provision of this data would go a long way towards restoring the community's trust of the project's designers and planners. In the face of continued resistance to release of such information, the public will remain sceptical of claimed improvements.

(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.

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

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally. The combined effects of noise, dust, vibration, air pollution and traffic congestion on the local population over a 6-7 year construction phase have been estimated as minimal within a number of sections of the EIS. This needs urgent review within a comprehensive Phase 2 contamination study, as the current contention is untenable.

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

We would be happy to attend the inquiry as witnesses.

Yours Sincerely,

Larissa Penn, President

Roger Promnitz, Vice -President

Naremburn Progress Association

Attachment A: Naremburn Progress Association Western Harbour Tunnel and Beaches Link EIS Planning Submission

Attachment B: Naremburn Action Group (NPA Subcommittee) Western Harbour Tunnel and Warringah Freeway EIS Submission

Attachment C: Submission from Naremburn Progress Association re Beaches Link Tunnel proposal

Attachment D: Naremburn Action Group (NPA Subcommittee) Submission regarding the Beaches Link

Attachment E: Bicentennial Reserve and Flat Rock Gully Advisory Committee – link to contamination notification

Attachment F: Nomination for the National Heritage List

Attachment G: Questions With Notice – excerpt from Willoughby Council Agenda 10 May 2021

Attachment H: email to Willoughby Electoral Office from Cr Stuart Coppock, Willoughby CC 30 April 2021

Attachment A: Naremburn Progress Association Western Harbour Tunnel and Beaches Link EIS Planning Submission

I write on behalf of the Naremburn Progress Association, a community group representing Naremburn residents, and which has been in continual existence since 1901. We OBJECT most strongly to the Western Harbour Tunnel (WHT) and Warringah Freeway Upgrade (WFU) Project in its current format for a number of reasons:

- We object to the lack of a Business Case available for public review, with attendant concerns regarding lack of transparency;
- We object to the lack of any real analysis of public transport options, especially when public transport should be the preferred alternative;

- We object to the “force-fitting” of WFU interchanges onto the existing road network which, rather than lessening road congestion, would appear to only be worsening conditions across a network already operating near peak capacity;
- We object to the lack of inclusion of filtered ventilation stacks, a number of which are in close proximity to sensitive sites;
- Given the above, no ability or costing for retrofitting of filters if/when the need arises;
- We object to the lack of real analysis or recognition of the massive transport and community disruption both during and after construction, extending over several years and across an area covering the entire Lower North Shore;
- We object to the significant risks arising both during the construction phase and post-completion to children and local residents across a range of environmental areas.

Business case

The lack of a Business Case underlines a real risk that there is no reason for this project to proceed. The Business Case should demonstrate the project provides real benefit to the community, both travelling and residential, with costs provided for options considered so as to provide appropriate transparency. The Business case should also show how risks have been mitigated.

Options

Section 4.3 provides a cursory treatment of other options considered, including the “do nothing” option. One of the considerations marked on Figure 4-3 is a B-Line route from Dee Why to Chatswood, yet this route is not even mentioned in the discussion of 4.3.5. More in depth analysis of the effects of this option is required, whilst the effects of the existing Northern Beaches B- Line need to be quantified, as it appears to have been very successful since its inception in 2017.

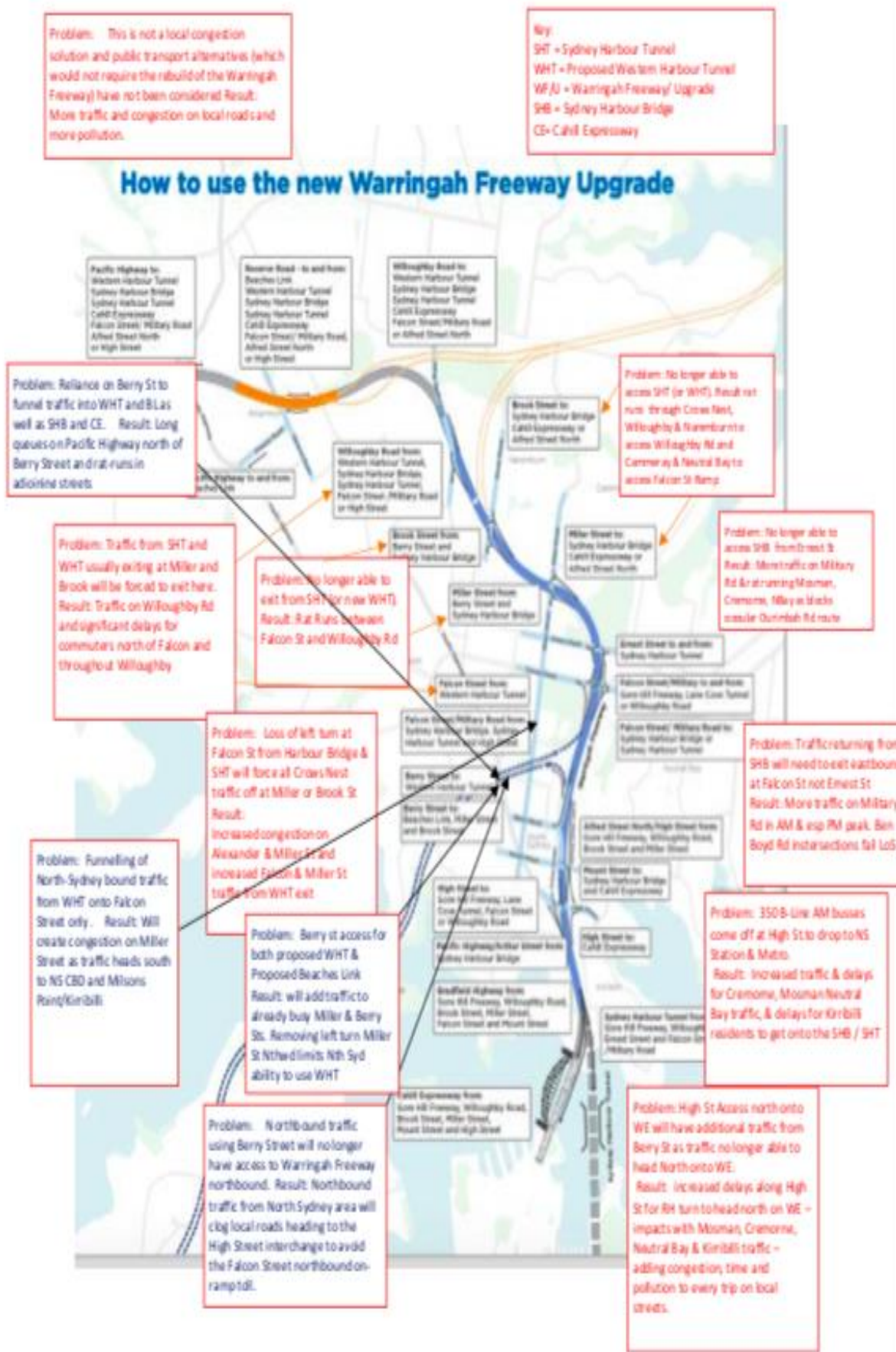
Another potential option that has been previously raised but has not been recognised in the EIS is the construction of a Metro spur from Chatswood to Dee Why via Forestville, Frenchs Forest and Beacon Hill. Initial responses have suggested that technical constraints make the option unfeasible, but without a full and frank analysis the community rightly feels “short changed” – such a stance by the project planners is unacceptable. Reference Plans should commence with a preferred Public Transport stance and this project presents a real opportunity for innovative design approaches to be utilised.

Proposed WFU interchanges

Rather than an upgrade of the Warringah Freeway, the Project is virtually a complete rebuild for the purposes of trying to facilitate the inclusion of several tunnel portals, on and off ramps, ventilation stacks and forecast significantly heavier traffic loads. The reduction in access to/from Brook St and Miller St to SHT especially will lead to the increasing use of rat runs as traffic seeks alternative entry/exit ramps. The EIS also acknowledges that there will be increased traffic pressure along Willoughby Road, an untenable situation given the volume of traffic already carried. The intersection of the M1 off-ramp and Willoughby Rd would also need a significant upgrade to carry any additional traffic, but this in turn would create an adverse environment for any redevelopment of the Naremburn Local Centre, a small shopping area the subject of extended discussions between the community, Willoughby Council and developers.

The schematic map below was released by project planners in an attempt to remove the confusion that had arisen from previous versions. However this clarification then drew into sharp focus how much the on/off ramps and tunnel portals needed to be force-fitted into the existing road network, with the various pinch points flagged and updated in the reworked schematic. These issues must be addressed as the

current "solution" is unacceptable.



Ventilation stacks

Both the location of stacks near sensitive areas and the proposal that they be unfiltered are grave and unacceptable risks and must be subject to review. The EIS concludes that such filtration is unnecessary and potentially a major cost impost, but no estimates are supplied for either the provision of appropriate infrastructure to facilitate post-completion fitout, or the cost of the filtration equipment itself. Without any costings provided it is virtually impossible for the community to make any call in balancing reduced risk against increased cost.

The positioning of the stacks in close proximity to schools in the area is also of great concern. The project construction footprint is adjacent to a number of schools, so will give rise to noise, dust, particulates and diesel fume exposures to school-aged children for 5-6 years, even under current estimates.

Extended disruption

With over 600 heavy vehicle movements per day for a 6 year construction period across an as-yet undocumented set of transport routes, plus increased congestion levels as acknowledged by the EIS, the project provides very poor lifestyle outcomes not just for residents living in the area but also for those attempting to travel through the Lower North Shore. Residents resent this poor treatment and the incessant pressure of short term community consultations. It is extremely unlikely that the best solution to a road congestion issue is to build another road. Improved mass public transport would go a long way to alleviating the need for any project such as has been proposed here, and the community stands ready to engage in meaningful discussion towards this end.

Roger Promnitz
President, Naremburn Progress Association.

Attachment B

Naremburn Action Group (NPA Subcommittee) Western Harbour Tunnel and Warringah Freeway EIS Submission

Objection to the EIS for the Western Harbour Tunnel and Warringah Freeway Project

This objection to the EIS is from the Naremburn Action Group (NAG) which represents 100+ residents living in or near the Naremburn Conservation Area.

We ask for a public transport alternative study, a business case that proves benefit and a plan with less risk.

We object to the EIS because

- The climate and sustainability outcomes are poor
- The transport and congestion outcomes are poor
- The risks to children and residents are far too high

The risks during the construction period for 5-6 years when 6000 construction vehicles a day are moving in our area, are considerable. The affected area is vast considering we have to see this EIS as part 1 of the overall plan that includes the Beaches Link. The work on the Warringah Freeway is not an upgrade. It's an almost complete rebuild for the purpose of fitting in four tunnel ports, two stacks and a huge volume of additional cars flowing under homes in Naremburn.

1. Noise impacts are considerable. For residents at Berrys Bay, around the Warringah Freeway and near various worksites along it, the impacts are significant. Noise is stated at being over limits for a minimum of 6 months to 5 years. This is true for residents in Naremburn who will have excessive noise from the Miller Street to Willoughby Road works. Some houses have been noted for additional noise attenuation in the long term. This should be a condition of approval.
2. Much of the noise management and mitigation is not documented yet. All local schools, child care centres and children's parks should have individual noise management plans and mitigation strategies agreed as a condition of approval. Wenona and Anzac Park schools will be considerably impacted.
3. Dust risks are considerable along the Freeway and contaminated spoil is a risk at Berrys Bay and Cammeray. Soil contaminants have been found to be a high risk at the Rosalind Street work site. A site should not be placed there. This may be indicative of soil contamination across Naremburn which is a highly residential area.
4. Contaminated sludge will be stirred up and removed from the harbour. This puts human health and the environment at risk and is of particular concern for Greenwich Baths and residents in the Waverton and White Bay Area. The public needs to know the exact concentrations of the chemicals in the harbour floor sludge before the project commences. The EIS should not have been released without having remediation plans signed off by the EPA. There is a lack of detail relating to measures to protect the water quality in Sydney harbour.
5. 600 vehicles on the roads from 11 construction support sites means dangerous goods are being moved about the area and more delays at our intersections. The route for truck movement is not documented and restricted access to local roads is not covered. This is unacceptable. A plan with each impacted local council needs to be drawn up and added as a condition of approval to ensure truck movements are kept off local streets and away from school drop off and pick up times. We need clarification around the route of contaminated spoil as the harbour crossings are restricted.
6. Due to the number of construction vehicles required the diesel output is enormous. Diesel is a class 1 carcinogen and a high risk to human health.

7. There will be dangerous goods transported through the streets and stored at support sites. Explosives will be transported to the Cammeray Golf Course site. This is extremely concerning given the high number of children around the area.

During the construction period under no circumstances should the Gore Hill Extension Project be included as a condition of the project covered by this EIS. It has not been fully risk assessed across all categories and therefore should not be included in any way, shape or form!

Post construction our area will face many challenges. There is no access to the harbour tunnel from Brook street so the rat- running through Willoughby and also Crows Nest to access the tunnel will increase traffic on local roads. The closure of the north bound ramps will result in increased traffic on Willoughby road. However the scope of the traffic analysis does not include Willoughby Road. This needs to be included given the challenge of the on/off ramps. A Traffic Management Plan needs to be put in place in consultation with Willoughby Council before approval of the project is given.

This EIS shows that our area will have increased traffic and reduced harbour crossing options for residents. Both projects support the unsustainable reliance on cars which will be competing for reduced parking spots.

We also have to live with unfiltered stacks. There will be increased air pollution around our schools because the State Government thinks that poor air quality is acceptable.

Objections to using Berry Street as a major on-ramp to the Western Harbour Tunnel need to be considered but if this project is to proceed it must be equitable and effective. Is it really appropriate to move this ramp closer to residential areas and into primary school zones? Do we move traffic pinch points along to whoever screams the least or is so concerned by economic and health issues that the EIS is not on their agenda?

We need better solutions and smarter planning for our cities. Let's start with a costed business case that proves the benefit of this project.

Julie Waddington
for the
NAG Steering Committee

26/03/2020

Attachment C: Submission from Naremburn Progress Association re Beaches Link Tunnel proposal

The Naremburn Progress Association (NPA) has nearly 100 members and is a community group which provides a mouthpiece for residents on issues of local significance. In this role, we must OBJECT most strongly to the Project Proposal and EIS for the Beaches Link tunnel due to the following:

1. No provision of Public Transport alternatives
2. Lack of properly defined Business Case and missing financial details, with superficial “Business Case Summary” conducted by Infrastructure NSW
3. Selection of preferred site or route - no evidence of consideration of other alternatives, and/or why they were rejected
4. No information or analysis re tolling considerations, nor any assurances regarding the continuance of currently toll-free roadways
5. No benefit whatsoever to local residents, with many facing access/egress difficulties to the tunnels due to remote entry/exit portals
6. Impact on amenity
7. Truck movements & associated parking congestion
8. Pollution
9. Child safety
10. Impact on heritage areas, with many potentially affected residences being located in sensitive Local Conservation areas

1. Public Transport Alternatives

The NPA OBJECTS to the continuing premise from the Proponent that the only solution to the area’s traffic congestion is to provide another road. Sydney is already choked with commuters using private motor vehicles who struggle on a daily basis to get to/from work/school/childcare/other engagements in a safe and timely fashion, yet the solution proffered here is to build another road. A far superior alternative would be the development of logical Public Transport alternatives. In this case, if movement of residents to/from the Northern Beaches is the most significant issue then a very real option would be the extension of Metro services from Chatswood via Forestville and Frenchs Forest to Dee Why, including linkage to the Northern Beaches Hospital precinct. Some feedback has been provided by the planners that there are a number of construction and cost issues with this approach without providing detail, but other options might include high-frequency buses (or even trackless trams), removing the need for the large number of vehicles seeking to travel to the CBD and beyond.

Any required upgrades at the Chatswood Transport Interchange could be achieved much more cost-effectively and in shorter timeframes than long distance road tunnels, so this option should be pursued, and Business case completed prior to any further developmental work on the current proposal. It is most unfortunate that a section of State Government- owned land located at the Chatswood Transport Interchange (1-5 Railway Street) and which was previously identified by local community groups as being an important asset to be retained for such future expansion, was subsequently sold off as being surplus to requirements – a tragic loss of a strategic asset.

2. Lack of proper business case

One of the greatest obstacles to gaining community acceptance of the Beaches Link proposal is the continued refusal of the Proponent to release the Business Case for the Project, so the NPA OBJECTS to this continued refusal. The lack of transparency around these details makes it frustrating to evaluate against other potential alternative solutions, and virtually impossible to conduct any sort of cost/benefit analysis. The ongoing decision to refuse release of the original Business Case must be reversed to facilitate full and

frank discussion of all aspects of the Project and a review of any area where community amenity and safety are at risk.

3. Selection of preferred site or route

The community has, over an extended period, been told that there was “no viable alternative” to the Beaches Link reference design. In response, the community has continued to request the provision of information which demonstrates what other options were seriously considered, and the reasons why they were subsequently discarded. Some community members even lodged GIPA requests at their own cost and were subsequently provided with heavily redacted information that was useless.

Infrastructure NSW published a “Final Business Case Summary” of the Western Harbour Tunnel proposal in May 2020 which made many references to the importance and interdependence of the Warringah Freeway Upgrade and Beaches Link projects without providing backup cost data. Benefit Cost ratios, “standard benefits” and associated data are tabled but the net result does little to clarify what real benefits are accrued, to what project do they belong, and are the benefits only realised if all Projects are completed as proposed.

4. Tolling strategy & associated assurances

The NPA OBJECTS to the lack of any tolling strategy details. The EIS confirms that the tunnels will be tolled, but no information has been supplied on this critical consideration. Toll avoidance behaviour can be readily seen around M4 East, M5 East, Bexley Road, Westconnex and Parramatta Road. Similarly, if tolls are too high on Beaches Link then motorists will engage in toll avoidance, leading to “rat running”, with reduced revenues then placing pressure on repayment timeframes. Another strategy mooted in recent times has been consideration of the imposition of tolls on previously toll-free sections of the existing road network, and/or the continuation or reimposition of tolls on roadways where debts had been retired. This is unfair – if all the claimed benefits of Beaches Link really exist then the “user pays” principle should apply. Unfortunately for tunnel users they are faced with the difficult decision of paying expensive tolls, or becoming one of the large number of drivers who elect to put up with ongoing traffic congestion rather than the financial drain of regular (and continually increasing) toll charges. The EIS also confirms Beaches Link as a capacity solution, not a congestion solution – the EIS prioritises freight and through traffic as a goal of the project above local congestion.

5. No local resident benefits

The only local entry points for the Beaches Link are via Artarmon and Berry St, North Sydney so for local residents no travel time saved: 10mins to get to entry, 10 mins in tunnel, 10 mins from exit to Dee Why or Manly = 30 min journey time. Hence the EIS makes it clear that this is not a local congestion solution, especially when the analysis flags several local intersections failing or with a worsened level of service both during and after construction as a result of the project -see Appendix F, Table 3.3.2

The Proposal will not achieve traffic improvement goals – the EIS notes only 10% reduction in the short term on Military Rd based on predicted traffic growth rather than current levels. The traffic model is not made available in the EIS so travel time savings and congestion reductions are unable to be verified. Where a road is already at capacity it is self limiting in that future growth cannot exceed the maximum capacity of the road, hence any travel time saving or reduction cannot be claimed on this basis.

Traffic differential modelling in the EIS shows increased traffic flows around the Warringah Freeway and on the Beaches Link exit portals. The project appears to transfer pinch points to alternate locations rather than solving congestion. A review of surface level traffic with all major local roads included in the operational modelling including Eastern Valley Way, Military Rd and Willoughby Rd was not included.

Given Willoughby Road's importance as both a feeder and distributor this inclusion is most important for Naremburn and Willoughby residents as other network routes will have curtailed flexibility when travelling to and around the CBD. The surface road traffic assessment should then inform the pollution impact of the project as the pollution contribution is not only limited to the ventilation stacks.

There are no dedicated bus lanes in the Beaches Link tunnels so the Proposal cannot be considered a public transport solution.

Prior to Covid, TfNSW data shows that the daily average traffic across the Spit Bridge has been decreasing for the last 4 years, while during the same period the traffic on Mona Vale Road through to Macquarie Park has been increasing. The Beaches Link would appear to be addressing an ever decreasing problem as progressively less people travel to and from the city from the Northern Beaches.

The forecasting accuracy of any traffic modelling used can be questioned when noted that base data is from 2014, with population data from 2016 and land use projections based on 2011 data. Claims are made within the EIS that the modelling "incorporates major urban renewal projects" yet ignores the wider effects of significant urban redevelopment projects such as the St Leonards/Pacific Highway 2036 Plan, St Leonards South redevelopment, Herbert St Health Precinct redevelopment and Crows Nest Metro Over Station Development (OSD).

6. Truck movements and associated parking congestion

The NPA OBJECTS to the large number of construction vehicle movements which will be required across the project in servicing the multiple construction sites because these are of great concern – 900 movements per day for Flat Rock Drive alone. These sites are in and around schools, sporting fields and school transport corridors, increasing the risk to children and staff. From figures within the EIS, Heavy/Light Construction Movements during the project are as follows:

Table 5-3 Summary of activities proposed at Beaches Link and Gore Hill Freeway Connection construction support sites - Daily vehicle movements: BL1 Cammeray Golf Course, Cammeray 305/ 275 = 580; BL2 Flat Rock Drive, Naremburn 355/545 = 900; BL3 Punch Street, Artarmon 580/370 = 900; BL4 Dickson Avenue, Artarmon 500/90 = 590; BL5 Barton Rd, Artarmon 120/35 = 155; BL6 Gore Hill Freeway median 100/10 = 110; Total Artarmon = 1755. BL7 Middle Harbour south cofferdam 60/4; BL8 Middle Harbour north cofferdam combined with foregoing; BL9 Spit West Reserve 200/220 = 420 and vessels 8/16; BL10 Balgowlah Golf Course 1195/ 495= 1290.

Total Additional Vehicle Movements Daily = 4950; Total Addition Vessel Movements Daily on Middle Harbour = 88. NB: The Western Harbour Tunnel and Warringah Freeway project which overlaps with this project between 2023 and 2026 requires another 6343 daily movements between Rozelle and Cammeray.

Of special concern is the 900 additional vehicle movements which will be required on Flat Rock Drive/ Brook St daily. This is a local road which services the connection from Northbridge via Naremburn to the city, and along which dozens of schools on the Lower and Upper North Shore travel daily as their school bus route. Brook St is also a significant active transport link from Willoughby to North Shore schools especially Cammeray, due to zoning. Keeping children of all ages safe along this corridor will be challenging, whilst residents living along the numerous "No Through Road" streets along this corridor and which can only exit onto Brook St will also face a higher risk.

Marshalling areas will be needed for trucks across all sites but particularly at the Flat Rock dive site. Marshalling should not be permitted on local streets and particularly not in the Naremburn Conservation Area due to the increased vibration risk. Trucks should not be allowed to idle while marshalling and every load should be tested and inspected to ensure contaminants are fully contained.

Trucks accelerating from a standing start up a long steep grade are likely to create a substantial amount of diesel pollution, the health impacts of which have not been fully assessed. An alert style monitor should be placed at Bicentennial Reserve to alert the community to high levels of pollutants.

The noise assessment claimed that the trucks on Flat Rock Drive would not create more noise however the assessment does not appear to account for engine braking or sustained use on long steep grades.

Spoil will be taken out from the Cammeray site across the bridge to an unknown location. On return the trucks will need to turn around at an undisclosed point - this may add more trucks to roads around Willoughby than currently documented in the EIS.

7. Loss of amenity

The NPA OBJECTS to the significant loss of amenity resulting from any realisation of this proposal. The area enjoys some high-quality sporting facilities (albeit heavily utilised) and very attractive and relaxing bushwalks, all used by large numbers of residents and neighbouring participants, and who face the prospect of the loss of these amenities for 6 years or more, if not forever.

8. Pollution

The NPA OBJECTS to the proposal on the grounds of excessive risk through additional air, water, soil and noise pollution. Despite the commitment to provide large sheds to cover most of the construction activities, uncovering the old landfill rubbish tip will expose the community to potential toxic air and surface runoff pollution, the latter also potentially finding its way into Middle Harbour. Disturbing the landfill will bring with it attendant asbestos-related risks, whilst constant heavy vehicle movements will mean exhaust noise pollution and particulate emissions. All this in an area which, more than 30 years ago, was a rubbish tip but with constant care and attention over the intervening period, is now an area enjoyed by families and bushwalkers alike.

9. Child Safety issues

The NPA OBJECTS to the proposal in view of the significant risks to child safety, especially around the Cammeray Public School area. Not only is the prospect of unfiltered tunnel exhaust stacks a concern for our children's health, but the 70 heavy trucks per hour means children will be at risk when attempting to cross roads travelling to/from school. Both Brook St and Miller St are already very busy so with the additional construction and operational traffic along these routes consideration should be given to the provision of a pedestrian overpass or underpass, at least at Brook St. Project designers need to be aware that Naremburn is part of the drawing area for several large schools, so additional pedestrian safeguards such as crossing guards or heavy traffic exclusion times need to be included in a revised pedestrian safety plan.

10. Conservation area impacts

The NPA OBJECTS to the proposed shallow tunnelling planned for under the Central Township area as much of this area is part of the Naremburn Conservation Area, characterised by 1-2 storey cottages with many heritage features and greatly valued by the community. Recent evidence from similar developments such as WestConnex has provided support to claims of vibration and drawdown damage with tunnelling depths much greater than the 20 metres indicated for under areas such as Garland Road and Slade St, Naremburn. Will TfNSW conduct extensive dilapidation reports at owners request and its own expense on all potentially affected properties, such that any claims arising can be handled in a timely and effective

way? How will compensation levels be determined? There is also a strong likelihood that real estate values in the area will suffer, quite independently of wider market fluctuations – how will these be handled?

Finally, the NPA most strongly OBJECTS to the location of this proposal in the Naremburn area at all. The catch-cry “all pain, no gain” is not an exaggeration as the community will suffer massive dislocation over an extended period owing to a combination of all the factors noted above, yet will enjoy none of the forecast advantages since entry/exit portals to the tunnels are either remotely located, or are virtually inaccessible to local traffic, with localised traffic congestion steadily worsening. The Proposal in its current form is not warranted from a traffic improvement perspective nor would it appear, a financial perspective.

Roger Promnitz
President, Naremburn Progress Association.

Attachment D

Naremburn Action Group (Subcommittee) Submission regarding the Beaches Link

Naremburn Action Group objects to the Beaches Link and Gore Hill Link project on the basis that Naremburn is an historically significant suburb representing many examples of original buildings from the 1800's. It was one of the first suburbs settled on the North Shore and the first in Willoughby. Many persons of historical note have lived here and contribute to its significance to our State's Heritage ie Henry Lawson. Despite its history the suburb has been intersected and dislocated by both the Warringah and Gore Hill expressways and is currently being overshadowed by increasing levels of high rise development. The Beaches Tunnel will pass under Naremburn at a relative shallow depth and the EIS confirms significant vibration and noise impacts as well as drawdown and settlement issues. In fact Naremburn is specifically noted as coming under the cumulative pressures of several stages of both the Warringah Freeway and the Beaches Link works. What has not been sufficiently scoped within the documents is the combined impact of tunnel constructions on our old homes which have shallow foundations on clay soils. NAG asks for a reassessment of the risk and potential loss of heritage and a reconsideration of the route to align under main roads and industrial area rather than areas of significant historical value.

Should the project be approved we ask that trucks not be allowed to Marshall or idle in the Naremburn Conservation Area, the tunnel to be dug at a deeper depth and for it to be fully lined to minimize drawdown impacts. We also ask that due to the age of buildings that properties across the area are provided with an independent assessment and any damage or stability issues are prioritized for repair to prevent further loss of heritage.

Please find attached an excellent history of the area which explains Naremburn's significance, its contribution to our State's development and the impacts it has already had to bare due to road building . It is noted that Naremburn receives no benefit from the construction and suburbs that do benefit bare very little impact. This is not equitable. This seems to be a repeating pattern throughout history and given that Naremburn is far older than many surrounding suburbs the choice to continually subject it to road impacts appears to be an attempt to completely obliterate the history of the area.

Please see attached an account of the rich history of the area:

https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwjg2qjOrobvAhVP8XMBHUTyC3YQFjABegQIAxAD&url=https%3A%2F%2Flibraries.willoughby.nsw.gov.au%2Ffiles%2Fsharedassets%2Fpublic%2Fecm%2Fwilloughby-city-library-website%2F1-the_naremburn_story.pdf&usg=AOvVaw2s88SAC_icZSZtrOW_YvYe

Julie Waddington

Steering Committee of the Naremburn Action Group (NAG)

Attachment E

Bicentennial Reserve and Flat Rock Gully Advisory Committee – Individual Members Submission

Community Representatives of the Bicentennial Reserve and Flat Rock Gully Advisory Committee and Bay Precinct Committee

Beaches Link and Gore Hill Freeway Submission

EIS SSI_8862

1. **Who Are we:** We are the community representatives of council committees which border the Long Bay catchment. The committee was first formed in 1983 to assist council in developing their Bicentennial plans and is responsible for advising council with regard to Plans of Management for the area. This submission represents the individual views of the non-council members. Bay Precinct is a North Sydney Precinct that borders the catchment on the southern side of Tunks Park and similarly is tasked with advising North Sydney Council – they are also included in this submission.
2. **Aim of the committee**
 1. To provide guidance on the current Plan of Management for Bicentennial Reserve & Flat Rock Gully as it relates to ongoing implementation, development work and management of these areas.
 2. To advise on aspects of the use, control and management of Bicentennial Reserve & Flat Rock Gully for consideration by Council.
3. **Scope:** The Bicentennial Reserve and Flat Rock Gully Committee (BRFRG) is tasked with advising the council with regard to Hallstrom Park, Bicentennial Reserve, Willoughby Leisure Centre, Flat Rock Reserve, Flat Rock Creek and Flat Rock Gully Bushland Area. Bay Precinct is tasked with advising the council with regard to Tunks Park and surrounds.

Due to the extent and uncertainty represented by the impacts listed the below non-council representative members of the Bicentennial and Flat Rock Gully Committee and Bay Precinct together **object** to the Beaches Link Tunnel and Gore Hill Link until such time as a reassessment is possible via a re-issued EIS. Willoughby Council will be submitting a separate submission and this content has been forwarded to them to inform their response. A re-issued EIS should include the following for public consultation:

1. **A phase 2 Contamination Study.** It is evident that insufficient testing has been completed to assess the risk of the project and make a Determination - particularly regarding the placement of a dive site in the Long Bay Catchment (in or around the legacy landfill site) and the risks associated with an Immersed Tube crossing of Middle Harbour. The Bicentennial Reserve Committee asks that a Phase 2 Contamination Study be completed, and the results published for further consultation with the community before any approval is given. We ask for current testing results to be released as, in contrast to Middle Harbour, no numerical data indicating the degree of any contamination has been released for Bicentennial Reserve or Flat Rock Gully.

2. **the need for the project**, and its superiority over public transport alternatives, has been demonstrated by way of a transparent process involving informed public engagement and consultation, noting that the EIS process has to date failed to properly evaluate the relative merits of such public transport alternatives.

3. **the Business Case** which details the cost/ benefits is released for public consideration.

4. The **EIS is re-released** for public consultation addressing the following areas of identified or under assessed risk:

1. That the use, social importance, contribution to community health, heritage, biodiversity and significance of the Long Bay Catchment composing of Bicentennial Reserve, the Baseball Diamond, Flat Rock Reserve, Flat Rock Gully and Tunks Park (within North Sydney Council boundaries) has not been sufficiently recognised in the EIS. Local groups, including the Bicentennial and Flat Rock Gully committee, have not been consulted as part of the design development or during the consultation process **Action: re-scope the area in consultation with this committee and other relevant groups who understand the history, importance and use of the area. See the attached background document for more information**
2. **Groundwater** under Bicentennial Reserve has been confirmed as contaminated and the EIS states that it may move through and around the site if the landfill downstream is disturbed **Action: fully test groundwater, publish the results to the public and provide for containment of contaminated groundwater**
3. It is recognised that the dive site sits in a **flood zone** and the flood study does not extend to Flat Rock Reserve or downstream environments where there is old growth forest and extensive playing fields. **Action: Extend the Flood Study including all downstream environments and the risk of contaminate migration during flood**
4. **Soil and gas testing** has not been completed in and around the site to establish the level of risk **Action: Complete gas studies at Bicentennial and Flat Rock Reserve and publish results**
5. The EIS states that there will be **high level noise impacts** at various stages of the project and that *“Five recreational receivers in NCAs 31.1 (Dawson Playground), 36.1 (Bicentennial reserve including Willoughby basketball and netball courts and the Flat Rock Baseball Diamond) and 38.2 (Shore playing fields) are predicted to experience noise levels above the noise management levels during the majority of the construction activities”* The period of construction is 5 years - this is unacceptable due to the thousands of children playing sport in the area and will also have a significant impact on biodiversity, esp. nocturnal species. **Action: Reconsider the placement of the dive site in the valley due to the noise implications close to sports fields, homes and habitats.**
6. The EIS states that there will be up to 900 additional vehicle movements required on Flat Rock Drive. This presents a significant diesel risk to users of the area particularly due to the steep gradients. *“The use of on- site diesel-powered vehicles, generators and construction equipment, and the handling and/or on-site storage of fuel and other chemicals, would result localised increased concentrations of airborne particulate matter, CO, NOX, sulfur dioxide and volatile organic compounds.”* Further **Action: Reconsider if placing the dive site anywhere in a steep gully and around landfill is too high a risk to children and communities. Mitigation: install an alert style real time air quality monitor that sporting groups and parents can subscribe to get real time alerts. Provide electric charging onsite, fit vehicles with pollution dampening devices.**
7. Construction dust risks have been identified in the EIS as a risk for both the bushland and sports fields and the EIS states that it is “difficult to contain”. The risk that this dust has the potential to be contaminated, is of high concern to the community. The health consequences of inhaling pollution while doing exercise is well documented whether contaminated or not. Children are particularly vulnerable to pollution impacts. Australia’s largest Netball Club plays in close proximity and the Baseball Diamond and Shore Oval may also be impacted. **Mitigation: Provide an alert style air quality monitor in Bicentennial Reserve/ Baseball Diamond mandate that no spoil is permitted to be housed outside of sheds (currently the EIS allows 500m3), mandate strong dust control methodologies for construction and transport, remove all contaminated spoil immediately from site.**
8. There are foreseeable traffic issues. The 900 construction vehicle movements per day on Flat Rock Drive and an additional set of lights at the bottom of the hill has the potential to push traffic onto local streets and cause widespread delays in and around sporting and recreational facilities. The conflict between construction vehicles and children getting to and from sport also needs to be considered. **Action: re-assess the local traffic implications particularly during Saturday Morning Sport. Mitigation: implement safety marshals for all intersections before, after school**

and on Saturday mornings. Consider designs that require less spoil haulage through local areas, re-consider the placement of the dive site in a deep valley surrounded by sporting fields.

9. The drawdown impacts are stated as: *“Northbridge as a result of the project will be 28m, in Flat Rock reserve 21m and at Willoughby Leisure Centre 22m”* resulting in water stress for vegetation and settlement issues. Draw down in the area will have a significant impact on the ability of our grounds to retain moisture and the viability of bushland in an area that supports endangered species. The area is already flood prone and settlement may exacerbate the issues around this as well as contamination. **Mitigation:** mandate that the tunnels be fully lined to minimise drawdown
10. The Operational Air quality modelling results confirm that our two representative community receptor points (CR25 and CR 26) are modelled to experience increased pollution as a result of the project with the highest increase across the project of 24hr PM2.5 at the modelled location closest to Bicentennial Reserve, as well as slight increases in NO2 (1 hr mean) and PM10 (24hr Mean). Given that the sports fields are housed

in a valley (Bicentennial, Baseball Diamond and Tunks Park) there is concern that inversion events will trap these pollutants in and around sports fields, walking tracks, active transport links and bushland. We note also that the local background air quality monitoring results were not used to establish background levels which are suspected to be higher in and around the Warringah Freeway and Gore Hill corridor than elsewhere. The overall project (Beaches Link and Western Harbour Tunnel) contributes to a 8.4% increase in CO, 6.5% increase in NOx, 7.1% increase in PM10 and a 7.1% increase in PM2.5 (Table 8-10 Appendix: Air Quality). The Federal regulatory review with regard to fuel efficiencies has been deferred so the project should be assessed on it's own contribution to pollution not the assumption that fuel standards will substantially improve the situation. The EIS also demonstrates that it will create a significant increase in vehicle kilometres travelled as compared to a do nothing future scenario. Our area is already at grid lock and parking is scarce – adding more vehicles to the roads, local transport hubs and creating more pollution is not reasonable **Action: Reassess the impact of air pollution on children's sport, active transport and users of the area. Provide a alert style air quality monitor indefinitely.**

11. The **biodiversity** of the area is under threat due to the clearing of 390 trees, contaminated groundwater migration, spoil and gas contaminants, wastewater flushing down the creek (1M+ of wastewater per day), flooding, significant drawdown (putting vegetation at risk), noise and run off from a disturbed tip site. **Action: reassess the biodiversity impacts in light of contamination results and the impact to the valley as a whole given it is one catchment, a wildlife corridor, a flood zone, subject to drawdown, the extensive impacts on the creek and other risks presented. Return trees to the area rather allowing them to be offset. Build a tall sound wall around the site to lessen noise impacts and protect birds such as the Powerful Owl from collision with trucks.**
12. **Active transport links** will be diverted and present a risk to health and safety. The active transport link around the dive site will add to trip times and be located in conflict with trucks, dust, noise, contaminated spoil removal etc This route presents a risk to health and safety. **Mitigation: implement an active transport overpass or alternative route separated from the construction site in consultation with Willoughby Council and the Bicentennial Reserve and Flat Rock Gully Committee.**
13. The potential for conflict with the **Northside Storage Tunnel** in the area has not been assessed. This may cause project delays, unexpected costs and present a risk to community and workers - given that it has a capacity to hold 500, 000 Million Litres of sewage and stormwater. **Action: Risk assess the conflict between the tunnels and the impact of vibration, drawdown and the health impacts associated with a spill.**
14. **Cumulative impacts** associated with the development of the Willoughby Leisure Centre have not been considered **Action: consider and document impacts in conjunction with Willoughby Council and Bicentennial Reserve and Flat Rock Advisory Committee and Bay Precinct.**

15. The *Protection of the Environment Administration Act 1991*(NSW) requires the “improved valuation and pricing of environmental resources”. The project as it stands does not achieve this requirement. **Action: redesign of the project to better protect the resources impacted by it and the provisioning of a remediation fund to account for any accidents that may occur, damage to sports fields and remediate the area: sports fields, ground contamination, water, bush etc to a level that is objectively assessed as superior to what is available to the community today. A benchmarking report should be completed prior to and after completion by an independent consultant to establish whether improvement across all categories has been sufficiently achieved.**

For contamination declaration: <https://www.planningportal.nsw.gov.au/major-projects/submission/783281>

Attachment F: Nomination for the National Heritage List

Nomination for the National Heritage List:

Long Bay Catchment and Naremburn Conservation Area

Thank you for your nomination of the above place for inclusion in the National Heritage List.

Your nomination will be considered by the Australian Heritage Council in preparing its advice to the Hon Sussan Ley MP, Minister for the Environment, on nominations eligible for the National Heritage List.

Once the Minister has considered the Council's advice, she will select a list of places (the Finalised Priority Assessment List) which the Council will assess. The Minister's selection of places for the Council to assess will be published on the internet at <http://www.environment.gov.au/heritage/places/priority-assessment>

The Department will write to nominators to advise of the Minister's decision. If you have any questions on this process, please email heritage@awe.gov.au.

Yours sincerely

Director
Heritage Strategies Section
10 June 2021

ORDINARY COUNCIL MEETING

18 QUESTIONS WITH NOTICE

**18.1 QUESTION ON NOTICE FROM COUNCILLOR COPPOCK - 04/2021 -
QUESTIONS FROM RESIDENTS**

RESPONSIBLE OFFICER: – PLANNING &
INFRASTRUCTURE DIRECTOR

AUTHOR: – DESIGN, CONSTRUCTION &
MAINTENANCE GROUP MANAGER

CITY STRATEGY OUTCOME: 5.1 – BE HONEST, TRANSPARENT AND
ACCOUNTABLE IN ALL THAT WE DO

MEETING DATE: 10 MAY 2021

QUESTION

These questions arise out of questions from residents.

1. **What safety precautions has Council undertaken in respect to the open water channel that runs parallel to Northcote Street, Naremburn from Chandos Street to Dalleys Rd?**

Council has undertaken channel repairs in the section from Mitchell St to Dalleys Road. Fencing repairs have also been undertaken in Talus Reserve from Evans Lane to Lane W171.

Council's Safe Inlet Design Program has identified the unfenced channel section west of Mitchell Street requires future safety treatment. This has been proposed for a funding allocation in the draft 2021/22 Operational Plan as part of project bid 301918.

2. **In the last five years what works have Council undertaken in respect to a stormwater drain in East Naremburn in Market St or Garland St?**

In recent years Council has undertaken a number of projects at the above locations. They include:

- Relining a pipe in 2017/18 that was in poor condition from Market Street to Garland Road, upstream of 22 Garland Road.
- Performing maintenance works in 2019/20 on a pit and pipeline through 23-25 Garland Road.
- Reconstructing the stormwater system under Market Street as part of the 2020/21 Operational Plan.

3. **If any such works have been undertaken, exactly were these works?**

As detailed above.

4. **If these works have been undertaken what subterranean issues did Council find in undertaking the works?**

No excessive seepage or ponding of ground water was evident during the excavation of trenches or construction works. The ground beneath the road surface appeared normal.

5. **Has Council received reports of land slippage over time at the eastern end of Market St Naremburn and the northern end of Adolphus St?**

The Design & Infrastructure Team and the Bushland team who have been involved in projects in this area have not identified or received reports on land slippage. Anyone wishing to report incidents of land slippage can contact Council on 9777-1000 or by email at email@willoughby.nsw.gov.au

6. **Has Council undertaken any work to ascertain the state of the road foundations in Garland, Market, King, High and Adolphus Streets, Naremburn?**

As part of a pro-active asset management program Council undertakes a comprehensive Road Pavement Survey every four years. That program assists in the prioritisation of annual road maintenance and renewal schedules.

The next Road Pavement Survey is due in 2021/22. It is a road surface condition assessment and although it can indicate road foundation failure, geotechnical investigation including road subgrade drilling and testing are not undertaken unless specific concerns have been raised or identified. Anyone wishing to report road related concerns can contact Council on 9777-1000 or by email at email@willoughby.nsw.gov.au

