

Submission  
No 474

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

**Organisation:** Cammeraygal High School P&C

**Date Received:** 18 June 2021

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The Hon. Daniel Mookhey MLC  
Chair  
Public Works Committee  
NSW Legislative Council  
Parliament House  
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<https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2767#tab-submissions>

**Cammeraygal High School P&C submission**  
**Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link**

Dear Members of the Public Works Committee,

Thank you for the opportunity to submit to the Inquiry about the impacts of the Western Harbour Tunnel and the Beaches Link on behalf of Cammeraygal High School P&C.

Cammeraygal High School is a growing school that was established in 2015. It has 2 campuses, 900m apart. The middle school campus is on the Pacific Highway in Crows Nest and the senior campus is in West Street. A total of approximately 850 students are currently enrolled in the school.

The school has a very active and supportive P&C. Please refer to the P&C website - <https://cammeraygalpandc.org.au/> for further information

The Western Harbour Tunnel (WHT) and Beaches Link (BL) program of works cuts through the largest school corridor in Sydney with an estimated 20,000 pupils. Cammeraygal High School (CHS), both campuses, is within that corridor. As a consequence, CHS is highly impacted by the construction of the BL and WHT as our school zone and catchment area with its students, teachers and parents will be exposed to construction impacts from these joint major infrastructure projects for an estimated 8 years if all runs to schedule. Time frames for the Western Harbour Tunnel and Warringah Freeway Upgrade (2021 – 2026) and the BL (2023-2028).

In the longer-term climate change is the biggest concern facing our children’s futures. Greenhouse gas emissions from transport emissions and environmental impacts from car and truck manufacturing must be reduced, not increased. These road projects are in conflict with our children’s need to combat climate change. A more liveable, accessible, sustainable city will never be achieved with these road projects that produce more traffic in Sydney.

The major focus of this submission centres on the health and wellbeing of Cammeraygal High School students in the short and long term. CHS objects to the construction of both the WHT and BL.

Cammeraygal High School P&C has previously made two submissions to Department of Planning, both being objections. These can be accessed by using the links below and have been cross referenced with the Inquiry’s terms of reference in the table below.

In addition, CHS has joined with other schools along the tunnel route to express our joint concern on the impacts of these projects on our children. 13 schools, representing over 10,000 students submitted their concerns to the Department of Planning through the BL EIS. The link to the summary of concerns is below:

**WHT submission –**

<https://www.planningportal.nsw.gov.au/major-projects/submission/711676>

**BL submission –**

<https://www.planningportal.nsw.gov.au/major-projects/submission/781606>

**Summary of school submissions to the BL EIS –**

[https://572a5e0d-c485-4d96-bc60-8a7a5f443045.filesusr.com/ugd/4b0485\\_8853185faaa64368a0f3280d0c75d150.pdf](https://572a5e0d-c485-4d96-bc60-8a7a5f443045.filesusr.com/ugd/4b0485_8853185faaa64368a0f3280d0c75d150.pdf)

(also attached)

**Other attachments referenced in this submission -**

- Diane Staats “Diane Staats - Harm to children from respirable silica dust”
- Map Cammeray construction site in relation to schools
- Map of Flat Rock dive site to sporting facilities

Terms of reference	Cross reference	Detail
<b>(a) the adequacy of the business case for the project, including</b>	WHT submission please refer:	A project business case must be performed for the project. The business case for all alternative options (eg Public Transport) must be considered.

<b>the cost benefits ratio</b>	Point 3	The proponents should seek to clarify the cost benefit analysis against calculated decreased life expectancy due to increased particulates. If the proponents will not use filtration, it questions the value that is placed on our children's' lives.
	BL submission please refer – Page 2	Asks for the business case to be released so as to substantiate the benefits of the project given the high level of risk and impact covered by the EIS. Provides data to substantiate the travel time savings quoted, re-assesses the local traffic impacts and more fully addresses costs.
	<i>Additional Comment</i>	The business case has not been released
<b>(b) the adequacy of the consideration of alternative options</b>	WHT submission please refer: Paragraph 2 – Paragraph 3 –  In concluding points	Sydney needs mass transit, rapid public transport for congestion relief and future proofing for population increase. Other options to address the problem of congestion must be considered in the EIS, as specified in the SEARS. Public Transport solutions must be assessed against the road proposal as specified in the SEARS. The EIS should correctly reflect uptake of roads versus Public Transport as population increases. Many more people are turning to public transport and this is reflected in research, but not in the EIS  The EIS should be revisited to reflect accurate traffic data. The traffic data is currently based on 2016 data and does not consider benefits of the B-line;
	BL submission please refer Page 3	There needs to be a public transport (mass transit) alternatives assessment to compare a toll tunnel solution to a public transport solution across all levels of the project ie) congestion, noise, air pollution, climate etc. The entire project needs to be certified carbon neutral during construction and operation
	<i>Additional comment</i>	Despite the environmental impacts, the contamination risks and the construction impacts, the EISs give no serious consideration to alternatives

<p><b>(c) the cost of the project, including the reasons for overruns</b></p>	<p>WHT submission please refer: Point 2a</p>	<p>We object to unfiltered ventilation stacks. If these road projects are to be built, then they must be safe. Ventilation stacks (2 of which are located within 300m of our school) must be filtered.</p> <p>There will be over 40km of additional polluting road (if the Northern Beaches Tunnel is also built) being pumped out unfiltered from the stacks near our school. Regardless of how much air is blown out of the stack along with the pollution (ventilation), the dose that will be delivered to our community is undisputedly the largest public health experiment we have ever seen. And the effect of the dose is cumulative. The RMS policy to not filter at any cost is wrong. The M5 East filtration trial cannot be extrapolated to filtration of stacks, which is what we are demanding. Filtration works and provides a demonstrable improvement to air quality. Filtration removes up to 95% of pollutants. It is used by first world countries on long road tunnels (over 5km) in urban areas. There is no other tunnel of this length with longitudinal ventilation in an urban area in the world. Other countries filter or do not allow trucks to travel in them.</p> <p>A cost of stack filtration should be provided in the EIS.</p>
	<p>BL submission please refer: Page 2</p> <p>Page 3</p>	<p>Contamination - Our school community is exposed to widespread risks of contamination from the Warringah Freeway, sports fields at Bicentennial and Flat Rock Reserve (also a major school route for many of our children), Cammeray Golf Course and smaller sites. These areas are both highly populated and well used for sporting and leisure activities however the risk assessment is incomplete and the EIS admits more testing is needed to assess the risk and establish mitigation measures.</p> <p>Dust risks - 500m<sup>3</sup> of spoil is permitted under the EIS to be stored outside of sheds at Flat Rock and 4500m<sup>3</sup> at Cammeray golf course. Spoil storage outside presents a significant dust risk to students when playing sport in the area.</p> <p>Infrastructure and procedures to ensure the safe passage of children to and from school ie) additional crossings, over/under passes, marshals etc have not been costed in the project</p>
	<p><i>Additional comment</i></p>	<p>Unfiltered stacks – filtering stacks has not been included in the cost of the project  Mitigating contamination risks across sites outlined would result in cost overruns  Infrastructure to ensure safe passage of children has not been costed in the project</p>
<p><b>(d) the consideration of the governance</b></p>	<p>WHT submission</p>	<p>By committing to the WHT and WHU and signing a contract with Transurban (the likely contract winner), the contract will preclude a Public Transport option that acts in competition with Transurban toll road profits. This project</p>

<p><b>and structure of the project including the use of a 'development partner' model</b></p>	<p>please refer: Paragraph 3</p>	<p>permanently subjects Sydney residents to reliance on their cars, and permanently subjects our children and their environment to extraordinary amounts of additional pollution due to induced traffic demand. Other options to address the problem of congestion must be considered in the EIS, as specified in the SEARS. Public Transport solutions must be assessed against the road proposal as specified in the SEARS</p>
<p><b>(e) the extent to which the project is meeting the original goals of the project</b></p>	<p>WHT submission please refer Paragraph 2</p>	<p>These road projects will produce more traffic in Sydney, and in particular to the new Warringah Freeway interchange near our school. Not to mention the surrounding road network. If the problem is congestion, then more roads are not the answer.</p>
	<p>BL submission please refer: Page 3</p>	<p>Travel time modelling is released to substantiate the benefits of the project given the high level of risk and impact covered by the EIS. Provides data to substantiate the travel time savings quoted, re-assesses the local traffic impacts (as per North Sydney Councils concerns) and more fully addresses costs</p>
	<p><i>Additional comment</i></p>	<p>The stated objectives to the projects are vague statements about reducing congestion and making faster journeys. There are no tangible, measurable goals or outcomes mentioned. The EIS travel time projections demonstrate that various intersections will suffer an increase in travel times (e.g. Amherst St/West Street, Miller St/Ernest St, Falcon St/Merlin St - WHT&amp;WFU EIS p. 9-23 to 24). This does not meet the goal of decreasing travel times for local residents – a large percentage of journeys will have delays but no time saving elsewhere. This project will enlarge the motorway and concentrate traffic at restricted entry points, encouraging 'rat runs'</p>
<p><b>(f) the consultation methods and effectiveness, both with affected communities and stakeholders</b></p>	<p>BL submission please refer Page 1</p>	<p>Cammeraygal P&amp;C had come together with 13 other local primary and high schools, public and private to write to the Minister for Planning and Open Spaces to request an extension to the EIS submission date. This was denied. Please refer to the request for an extension letter attached which outlines why an extension request was sought. Link to joint school letter requesting an extension to submit to the BL <a href="https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SUB-15400994%2120210301T032755.508%20GMT">https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SUB-15400994%2120210301T032755.508%20GMT</a></p>

	<i>Additional comment</i>	the BL and WHT were both released just before the summer school holidays. People were away, schools closed, many busy caring for children. It was a bad time of year to read through 1000's of pages of technical material and concentrate on making sense of the EIS with all its chapters and appendices. It was very difficult to find specific information quickly or easily. There was also further difficulties in consultation exacerbated by the Covid 19 pandemic as it restricted meetings, community gatherings, access to hard copy documents at the local library
<b>(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</b>	<i>Additional comment</i>	The changes to travel and work patterns as a result of COVID-19 impacts have not been considered in business cases, cost-benefit analyses, or traffic projections. TfNSW have indicated that these effects are “temporary”, despite research and evidence showing significant permanent changes. Many more Cammeraygal High school parents are working at least some of the time at home.
<b>(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 and (i) whether the project is subject to the appropriate levels of transparency and accountability that would be</b>		See (a) and (d) above  <i>Additional Comment</i> The failure to publish the business case, and the failure of the EISs to include relevant matters means that the projects fail to meet the levels of transparency and accountability which taxpayers are entitled to expect.

<p><b>expected of a project delivered by a public sector body</b></p>		
<p><b>(j) the impact on the environment, including marine ecosystems</b></p>	<p>WHT submission please refer Point 1 Point 2f and 2a</p>	<p>Climate change – impact on the environment</p> <p>Green space - We object to further encroachment of surrounding green space around ANZAC park school, loss of greenspace behind the Greens and loss of green space at St Leonards Park and the 11 other construction sites taking green space for the duration of the project.</p> <p>Green Space should be increased, not decreased. The North Sydney Local Government area has the highest density living on the North Shore and the least amount of green space.</p> <p>Air quality - The EIS should be recalculated to reflect actual emissions data, as this will impact health assessment. The EIS currently calculates emissions assuming that we will be at Euro 6 standards by 2021. This is wrong. There is no plan to achieve Euro 6 standards. The proponents cannot claim that there is. There could be legal implications for a government body misrepresenting something so important. The Science on Health impacts of air pollution has overtaken this project. We know so much more about the negative impacts of air pollution. The Department would be wise to ensure that they adequately address the accuracy of air quality, number of sensitive receivers and health claims made by the proponents</p>
	<p>BL submission please refer Page 1</p> <p>Page 2</p> <p>Page 3</p>	<p>Increased Particulate Matter from vehicle emissions and unfiltered stacks – This is already higher than what is recommended or considered “safe”. PM2.5 and PM10 levels are already above the guidelines for both the 24-hour average and the annual average (including the 2025 goal set by NEPC (2016).</p> <p>Contamination and dust exposure</p> <p>Environmental impacts - Waterways, reserves, flora and fauna will be impacted. Our urban bushland is fast disappearing. For the future of our urban environment, we can not afford to put construction sites, with all their impacts, in biodiversity rich areas.</p> <p>Cammeraygal High School P&amp;C objects to the project overall until the entire project is certified carbon neutral during construction and operation</p>



	<p><i>Additional comment</i></p>	<p>Dust risks - I have attached a paper, written by a parent of Cammeraygal High School who has a legal background and has been giving her time and expertise freely as she is so concerned about our children's health. The attached outlines the risks of harm to children living, playing sports and going to school in close proximity to the construction site at Cammeray Golf course from exposure to <b>respirable crystalline silica (RCS) dust</b>.</p> <p>The paper notes that children going to school at <b>Anzac Park Public School, Cammeray Public School, KU Cammeray Preschool, Cammeraygal High School (Senior Campus), Neutral Bay Public School, Wenona School, North Sydney Boys High School, Marist Catholic College North Shore (both senior and St Marys), Monte Saint Angelo</b>, and children exercising at Green Park and Cammeray Oval and Tennis Courts, are potentially affected.</p> <p>The paper has been reviewed by Ian Bridge, an environmental scientist, university lecturer, and expert on non-occupational exposure to RCS dust: <a href="https://www.linkedin.com/in/ian-bridge-5639908/">https://www.linkedin.com/in/ian-bridge-5639908/</a></p> <p><b>Ian Bridge recommends the application of additional mitigation measures in order to keep children safe:</b></p> <ul style="list-style-type: none"> <li>• a negative pressure acoustic shed</li> <li>• tunnelling spoil be loaded into trucks using a method to prevent the emission of particulates during loading operations</li> <li>• ambient RCS levels are limited to 3ug/m3 with stop work requirements when exceeded</li> <li>• monitoring of particulates in areas where children may be exposed</li> <li>• stockpiles from surface works should be contained in a second shed; if temporary stockpiling is required, it should covered at all times</li> <li>• monitoring, including cameras, with real time data feed, be installed and with results accessible by the Community.</li> </ul> <p><b>Reconsideration of alternatives</b></p> <p>In light of the potential harm to children from respirable crystalline silica dust and other particulates from construction activities, <u>unless</u> the Government is prepared to adopt mitigation measures to <u>fully</u> address harms from exposure to RCS (as detailed in this paper) and harms from other particulates from construction activities as detailed by Lung Foundation Australia and Asthma Australia: <a href="https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-11439174%2120210310T211916.024%20GMT">https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=EXH-11439174%2120210310T211916.024%20GMT</a> , it is recommended that NSW Government should look at alternative transport solutions and/or alternative routes to avoid having a dive site at Cammeray in close proximity to so many schools, and other sensitive receivers.</p>
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		<p>The above was distributed to all local schools impacted by the projects. CHS published through its school newsletter to inform the school community</p> <p>See attachments -</p> <ul style="list-style-type: none"> <li>• Diane Staats “Diane Staats - Harm to children from respirable silica dust”</li> <li>• Map Cammeray construction site in relation to schools</li> <li>• Map of Flat Rock dive site to sporting facilities</li> </ul>
<b>(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally</b>	WHT submission please refer point 2c	We object to the 8 years of adverse construction noise and vibration that these projects will bring, impacting our children’s ability to learn
	BL submission please refer Page 2	Noise – This will be a problem across the area with most of Cammeray/North Sydney impacted according to the EIS and many greenspace locations are specifically mentioned as being noise affected throughout the project. Already noise from the Warringah Freeway works will impact 1917 receiver buildings in Cammeray and North Sydney during the project. This will impact on human health and quality of life for our children and their families
	<i>Additional comment</i>	<p>Contamination -</p> <p>The lack of compliance with and enforcement of Conditions of Approval (COAs) applying to the WHT demonstrate that the processes aren’t working. Failure to protect against risks from contamination.</p> <p>The WHT proceeded to approval with only a preliminary assessment of contamination being completed. This is problematic as many aspects of the project such as waste removal and remediation cannot be planned for without a detailed assessment.</p> <p>The BLT EIS has also not included any detailed assessment.</p>

	<p>The Department of Planning Industry and Environment (DPIE) imposed Conditions of Approval (COA) on the WHT which required a Detailed Site Investigation (DSI) to be undertaken, before construction starts, where a site has been identified in the EIS as being at moderate to high risk of being contaminated. The DSI, which should contain the more detailed contamination assessment, is supposed to be placed on the TfNSW website, before construction starts. There is no requirement that the DSI report remain on the website for a specified time before work commences to enable it to be considered by residents, other stakeholders or regulators such as the EPA, which is itself problematic.</p> <p>Construction began at the Ridge Street site, within St Leonard's Park, without the DSI report being prepared and published. Standard contamination management measures required by the COA, such as dust screens and run-off controls also appear not to have been implemented, despite the proximity of the site to a pre-school.</p> <p>Of the three DSI reports prepared to date - Ridge Street, North Sydney, Rosalind Street, Cammeray and Arthur Street, North Sydney – the first two involve a site carved out of a park and one in close proximity to a school, respectively.</p> <p>They do not adequately protect school children, and other sensitive users, as they: • do not consider impacts, and transmission pathways, off-site as required by the COA • assess contaminants according to generic industrial/commercial health-based investigation levels rather than the more rigorous recreational/residential levels.</p> <p>There would be exceedances of benzo(a)pyrene at all sites and lead at Arthur Street if samples at the sites are assessed against recreational/residential levels. • in Rosalind Street asbestos and polycyclic aromatic hydrocarbons reported in the WHT EIS have been ignored, on the basis that it couldn't be confirmed that the samples referred to in the EIS showing the presence of those contaminants were taken within the site.</p> <p>The Ridge Street issues were reported to the DPIE, on 9 April but no enforcement action has been taken. The recently published Rosalind St and Arthur St DSIs have also been reported to the DPIE for investigation.</p> <p>The failure to effectively manage contamination risks directly impacts student access to recreation due to identified threats including to Bicentennial Park and Flat Rock Gully from disturbance of a former tip site. (with thanks to WEPA – Willoughby Environment Protection Association)</p> <p>Neither Transport for NSW or the DPIE have consulted or contacted the CHS P&amp;C to inform of the start of preliminary work in relation to Warringah Freeway Upgrade. They did not advise of the approval given to increase heavy vehicle</p>
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		<p>movements through local streets. The approval letter re: increased heavy truck movements on local streets can be found here:  <a href="https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-8863-PA-10%2120210412T054313.029%20GMT">https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-8863-PA-10%2120210412T054313.029%20GMT</a></p> <p>As students are sensitive receivers, works that impact on children's safety, need to be communicated to the school and the P&amp;C through regular meetings and consultation</p>
<b>(l) the impact of the project on nearby public sites</b>	WHT submission please refer Point 3	Impact on green space and should be increased not decreased
	BL submission please refer	Biodiversity and loss of greenspace - At Cammeray Golf Club greenspace will be lost to make way for permanent utility sheds for the Beaches Link. At Flat Rock Gully 390 trees will be removed for the dive site. There is no guarantee that the bushland will be reinstated, yet it is home to over 100 species of animals (including the powerful owl) and is a major wildlife corridor
	Additional comment	<p>The impact of the projects on nearby public sites includes the permanent loss of 2.8 hectares of community green space, equivalent to four soccer fields, in Cammeray Park; and the impact on areas such as Bicentennial Reserve and Flat Rock Gully</p> <p>The BL also poses contamination risks to Tunks Park which is at risk from contamination emanating from the old tip site in Flat Rock Gully, as notified to the EPA by Willoughby Council in February 2021 pursuant to section 60 of the Contaminated Land Management Act.1979.</p>
<b>(m) any other related matter</b>		The WHT and the BL Tunnel will contribute significantly to our greenhouse gas emissions both during construction and through the increased number of cars using it (even if many are electric vehicles). The project is not consistent with NSW greenhouse gas emissions reduction policy and Net Zero by 2050 goals to deal with climate change.

I am happy to have our name published.

Megan Salmon  
 President, Cammeraygal High School P&C

