

Submission  
No 476

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

**Organisation:** Willoughby South Progress Association

**Date Received:** 18 June 2021

---



President: Karen Borg  
9 Edward St  
Willoughby 2068  
wspassociation@hotmail.com

18 June, 2021

## **Submission to the Legislative Council Inquiry into the Impact of the Western Harbour Tunnel and Beaches Link**

The following submission is made on behalf of the members of Willoughby South Progress Association. It is within our association's boundaries that major traffic impact will occur on Willoughby Road and its feeder streets and where the Flat Rock Gully tunnel access decline is located.

In summary, the Association objects to findings of the Beaches Link and Gore Hill Freeway/Western Harbour Tunnel Connection Environmental Impact Statements as originally submitted to each of the two E.I. Statements as set down in the two supporting attachments and as further outlined in this submission to the L.C. Inquiry.

Referring to the Terms of Reference issued by the committee, we make the following observations:

**(a) the adequacy of the business case for the project, including the cost benefits ratio,** covered in item 1 of our attached NBL original submission dated 1 March 2021

**(b) the adequacy of the consideration of alternative options,** It has always been our contention that alternate options have been given merely lip service. The claim by TfNSW that heavy rail/Metro/light rail is not practical only serves to indicate how little work must have been done on this alternative. With the concentration of residential and commercial/industrial activity at least as far north as Dee Why, some form of public transport other than bus is justified both on economic and environmental grounds. This would have the additional benefit of easing congestion along Military Road and its feeders.

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

**(d) the consideration of the governance and structure of the project including the use of a ‘development partner’ model,** We would expect that the government learns from previous experiences with this model and institutes a program of close and transparent oversight of the project.

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

**(f) the consultation methods and effectiveness, both with affected communities and stakeholders,** Covered in our attached original submission to the WHT EIS, dated 29 March, 2020. The lack of consultation regarding traffic effects in Willoughby and Artarmon can only be described as appalling for a project of this scope.

**(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,** Covered in item 2 of our original NBL submission, attached to this submission.

**(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,** As the community, in many ways, pays for these projects and elects our government representatives, how can the government not place the above on public record?

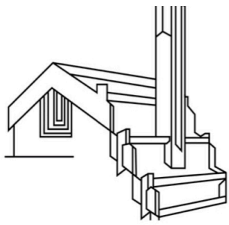
**(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body,** Our comments to item (i) above apply.

**(j) the impact on the environment, including marine ecosystems,** Covered in item 3 of our original NBL submission, attached to this submission

**(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally,** This involves technology beyond our resources, however, again from reports of previous major projects, this aspect of the project needs to be totally transparent, with an independent commissioner or panel to hear appeals due to the impacts of noise and vibration on residents.

**(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths,** Both the WHT, with its Willoughby Rd traffic impacts and the NBL with its risky tunnel decline location within the Willoughby Bicentennial Parkland, on the site of an earlier landfill facility, are both potentially negatively impactful for the local Willoughby community.

**(m) any other related matter,** Within the Bicentennial Parkland is one of WCC’s major sporting venues including a watersports complex for which the DA for a complete renewal has just been approved and budgeted for.



WILLOUGHBY SOUTH  
PROGRESS ASSOCIATION

The Secretary  
C/- 18 Chiltern Rd  
Willoughby NSW 2068  
wspassociation@hotmail.com

---

## WILLOUGHBY SOUTH PROGRESS ASSOCIATION

### SUBMISSION TO THE WESTERN HARBOUR TUNNEL E.I.S.

30 March 2020

Thank you for the opportunity to respond to the Western Harbour Tunnel EIS.

**Introduction:** Willoughby South Progress Association (WSPA) is one of nine Progress Associations in the Willoughby LGA. The Willoughby South area includes the section of Willoughby Rd from the Garland Rd intersection to Mowbray Rd and includes the Willoughby Rd local shopping strip centred on the intersection with Frenchs Rd.

In the near future we will see the addition of 460 apartments in the Channel 9 redevelopment project, on Artarmon Rd, and a further 250 in a redevelopment of the northern side of Walter St, recently rezoned to R4.

**Submission:** We **object** to the Western Harbour Tunnel EIS as it fails to provide a complete and accurate environmental impact assessment as per the requirements of Division 5.2 of the *Environmental Planning and Assessment Act 1979*.

Among the requirements of the EIS is the assessment of the areas directly or indirectly affected by construction and operation of the project. We note on page 1.5, ***“In accordance with Division 5.2 of the Environmental Planning and Assessment Act 1979, this environmental impact statement presents an assessment of potential environmental issues identified during the planning and assessment of the project. The assessment considers the area directly or indirectly affected by construction and operation of the project, as relevant to each technical assessment.”***

Our major concern is traffic implications for Willoughby Rd and its surrounding streets arising from the reconfiguration of the Warringah Freeway (WF).

The reconfiguration works which will have a major impact by increasing the traffic load on Willoughby Rd are:

- i) the loss of access to the Miller St and Brook St exit ramps for Sydney Harbour Tunnel traffic heading north.
- ii) the loss of access to the Sydney Harbour Tunnel from the Brook St on-ramp for traffic heading south.

Both Brook and Miller St entry/exit ramps are major dispersal roads for traffic which would not use the proposed Beaches Link Tunnel. This comprises traffic heading to East Chatswood, Northbridge, Castlecrag, Castle Cove, Roseville, Lindfield and north to St Ives and beyond as well as the areas of Forestville, Killarney Heights, Frenchs Forest, Belrose, Davidson, Terry Hills and beyond.

In view of the successful existing traffic configuration, with SHT traffic having the option of using both Miller and Brook St ramps, it is difficult for us to appreciate both the reasons for, and the benefits of, the proposed reconfiguration and we request that this aspect of the planning be abandoned in favour of the existing ramp entries and exits. To shift a major portion of the SHT traffic onto Willoughby Rd will further overload an arterial road already acknowledged as operating at full capacity in peak hours.

Recently, as part of its strategic planning to 2036, and in line with Greater Sydney 30 minute city planning, Willoughby City Council (WCC) have proposed plans for revitalising the Willoughby Rd local shopping strip, centred on the intersection with Frenchs Rd. After two rounds of consultation, the plans have been accepted by the local community. The critical item in the planning is parking space as the local businesses all rely heavily on parking space on Willoughby Rd. To have this facility threatened by additional traffic demand is to threaten the lifeblood of these businesses and consequently our local shopping precinct.

Our further concern is the lack of a traffic study of Willoughby Rd. Chapter nine of the EIS addresses traffic management associated with the WHT/WF project. In this chapter there are several locations where studies have shown there will be further impairment of existing traffic flow due to the WF reconfiguration. One of these is in Artarmon, at the WF on-ramp for Pacific Highway traffic, in the morning peak. Some of this traffic already uses Willoughby Rd as an alternate access to the WF and this will be exacerbated by the WF reconfiguration. However, nowhere in Chapter nine can we find any mention of a study of the traffic effects on Willoughby Rd and surrounding Willoughby streets in our area.

Within the next three years more than 700 additional apartments will be added in Artarmon Rd and Walter St, immediately adjacent to Willoughby Rd, and additional traffic lights, approved by the RMS, are contemplated in conjunction with the Walter St development. Morning peak traffic delays in Artarmon Rd at the Willoughby Rd intersection, often already at two or even three light changes, are likely to be exacerbated by the additional Willoughby Rd traffic.

We request the EIS be revised with additional sections added to Chapter nine providing a detailed study on:

- i) the impact to Willoughby Rd and its feeder roads of Penshurst and Mowbray Rds as the above closures will force more traffic onto these roads.
- ii) the impact to the local streets surrounding Willoughby Rd as traffic attempts to rat-run through residential suburbs.
- ii) the impact on the Local Centres of the increased traffic as Willoughby Road, and its Penshurst St extension, bisects at least three of the seven Local Centres in the Willoughby Local Government Area.

When the study has been completed we request the opportunity to make comment as the representative body of the area affected.

Yours faithfully,

Bob Taffel  
On behalf of  
Willoughby South  
Progress Association



President: Karen Borg  
9 Edward St  
Willoughby 2068  
wspassociation@hotmail.com

1 March, 2021

## **Submission to the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement**

The following submission is made on behalf of the members of Willoughby South Progress Association. It is within our Association's boundaries that the Flat Rock Gully access decline is located.

**In summary the Association objects to findings of the Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement (December 2020) for the following reasons:**

- 1. Business Case:** No business case has been released, separate from the Western Harbour Tunnel project. Without a separate business case, the scope of the Northern Beaches Link Tunnel (NBLT) is such that the community is not able to assess the financial advantage of this separate major project.
- 2. Traffic Density:** No account appears to have been taken of the effect of the Covid pandemic on future traffic density. It is commonly understood that many businesses will continue to operate, at least partially on a "working from home" basis leading to a permanent reduction in peak traffic loading on each of the Peninsula traffic feeder roads. This brings into question the need for the NBLT. We recommend that the timing of the build program be put back a minimum of two years in order to assess the actual effect of the Covid pandemic and thus whether the business case will support the cost of this infrastructure. The business case will likely be set further back by the introduction of the planned express B-line bus service from Dee Why to Chatswood in conjunction with the completion of the Sydney Metro South.
- 3. Environmental Considerations:** The location of the tunnel construction decline at the top of Flat Rock Gully (FRG) threatens a 25 year effort by Willoughby Council (WCC) to create a bushland reserve on what was, for many years, a council landfill site. This bushland section provides habitat for a wide range of native animals, invertebrates and birds and has been classified by WCC as an Environmental Conservation Zone exactly so that disturbance as

threatened by the tunnel construction, cannot occur. This section of FRG also is an important link in the wildlife corridor between the Lane Cove River and Middle Harbour. These corridors are vital in maintaining native animal populations which are in the process of decline across Sydney. We can't afford to lose this part of the corridor.

Further, polluted water flows originating from the disturbed ground of the remediated land fill tip that was once in FRG, both due to leachate and flood water flows, is not dealt with in sufficient detail in the EIS. This threat which affects both the Tunks Park playing fields, and even more seriously, the waters of Middle Harbour, poses a major environmental threat of the FRG decline works. Whether due to climate change or not, we have experienced two one-in-a-hundred-year rainstorms in the past three years and video evidence of the effect on Flat Rock creek is compelling and leads us to the conclusion that far more detail needs to be provided in the EIS as to how these events will not lead to serious downstream pollution.

**4. End of Construction:** The EIS is non-committal regarding subsequent use of the decline site following completion of the project. The environmental importance of the FRG bushland cannot be overstated therefore it is essential that the FRG dive site be returned to bushland and not be used to expand sporting facilities as has been suggested by interested parties. This is the more so in view of the major residential developments occurring on the nearby Channel 9 site, along Willoughby Rd and in Walter St. It is not just the local general community that would benefit from the return to bushland with its walking paths and space for quiet enjoyment; their numbers are far greater than those represented by the various sporting bodies using the Willoughby Bicentennial facilities.