

Submission
No 505

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

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Submission: TO THE LEGISLATIVE COUNCIL INQUIRY into THE WESTERN HARBOUR TUNNEL AND BEACHES LINK TUNNELS

, Kirribilli

15 June 2021

This submission responds to the Terms of Reference (ToR) issued by the Inquiry. Issues relating to the tunnels were discussed at the Milson precinct meeting on 3 June 2021 which passed a motion to submit the precinct's views to the Inquiry, by forwarding the initial submissions made to DPIE. The meeting was attended by 41 residents, although the precinct accommodates several thousand people living both in houses and apartments to the east of North Sydney's business district, on two peninsular, who's access will be impeded greatly by the changed traffic to accommodate the tunnels and cars from elsewhere. Not to mention the 350 + peak hour buses coming out of the tunnel, through High St, to cross the Pacific Highway, to be able to have passengers transfer to other modes – rail or metro. The High St intersection fails already in peak hour, with these additional buses, as well as 'on-ramps' for tunnels and Warringah freeway at this same road / intersection, it will be a 'parking lot', vs a moving traffic-able road. This precinct's community will consequently, be among the areas most adversely affected by the planned tunnels.

This submission is to reinforce the position made previously, objecting to the construction of both Western Harbour Tunnel and Beaches Link tunnels, due to the impacts on our air quality, the environmental impacts of tunnels encouraging more cars on the road, versus sustainable transport modes, which were not addressed in these proposals, nor was the business case made. Thus it is flawed! These tunnels should not go ahead, until many of the issues and concerns raised in the 3000 submissions made (where 90% were objections), are addressed and dealt with. Let's not waste my tax dollars on infrastructure that has not been well thought through. It should always be a case of design or measure at least twice, thrice, or even four times and only cut or build once, and get it right the first time. Sustainable transport would be the right option for the northern beaches.

The impact on our local streets, with other traffic having to come through North Sydney CBD to gain access to the tunnels, is totally inappropriate. North Sydney was divided in two by the Warringah Freeway, and now you wish North Sydney community to wear all the burdens with these new tunnels, cutting the CBD again, this time North & South via Berry St. We will absorb the increased pollution from the unfiltered air vent stacks; we have to contend with the additional pollution spreading over our suburbs from the increased numbers of cars utilising the tunnels, and coming out onto the Warringah Freeway, dispersing their pollution particulates, onto our area. It is unfair that the ongoing future negative aspects of pollution, traffic etc. of these tunnels needs to be borne by North Sydney communities alone, when the benefits are all for others, including the commercial operator, and others who live further afield. There is no equity in this outcome.

North Sydney Council's concerns raised in their very thorough submission, have not been addressed. It is not appropriate for a public sector body to not be transparent and accountable to, or ignore the concerns, of the elected local government body, whose community that they are trying to represent and protect, has to wear all the hardship of these proposed developments, both through construction, once operational and into the future forever.

This submission objects to the construction of both tunnels, at least until alternative transport improvement measures have been adequately researched.

Sections are left blank where we have no views about the topic or comments to make. We also attach our submission to the beaches link EIS assessment, objecting to the Beaches Link.

Comments on the Western Harbour Tunnel (WHT) project closed in March 2020. In September 2020, a 412 -page Part C Response to Community Submissions was published. A review of this document indicates that no significant responses have been made to the objections raised. As example we would note the issues and response in Section 4.1.1 which discusses the lack of economic analysis. The answers to these issues, as to most previous sections are inadequate. Section 4.1.3 has similar deficiencies. Overall, we consider that the responses to submissions and objections are mainly inadequate.

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

In our opinion the business case is inadequate. We have been unable to locate a benefit cost analysis for either project, though a net present value summary table was presented in the Final Business Case Summary for the WHT.

WHT

We are unable to find any reference to the likely financial and economic performance of the project. It is noted that the dismal financial failures of the Lane Cove and Cross City tunnels in 2010 and 2005/13 were caused by wildly optimistic traffic forecasts. For both WHT and Beaches Link (BL), it is considered that financial performance estimates are essential. These would need to include estimates of the likely use of the tunnel and toll costs.

Nowhere in the 1263 page EIS¹ is there mention of origin and destination surveys of road users currently using the Harbour Bridge and Tunnel. This would seem to be an essential part of any study.

The Final Business Case Summary for the WHT was published in May 2020, and in Table 1 on page 12 indicates a benefit cost ratio of between 1.2 and 1.7. These are quite low, and moreover, the assumptions supporting them have not been published. Net present value is estimated at between \$0.8 and \$2.8 billion – low levels considering the \$14 billion cost or possibly much higher.

To be clear about the implications of these numbers: rapid changes in transport technology will only reduce the benefits, while the size and complexity of the project may result in an increase in costs. See also TOR (c) and (g). Thus the benefit cost ratio is likely to turn negative during the construction of the project (if it is not negative already), and become increasingly negative over the life of the tunnels. In short, this is almost certainly a public project with negative net benefit.

Beaches Link

¹ The whole EIS combined into one file, is 320 MB in size. A file size reduce brings the file down to 43 MB. This could be emailed to the Inquiry if useful. The large sizes of the individual chapter files make it more difficult for individuals to download and review the documents – a negative aspect of the EIS.

In the 1428 pages of the Beaches Link EIS excluding appendixes, there is no reference to the likely economic performance of the road. It is highly desirable that such analysis is made available to the Inquiry and the public, so that we can see what is the likely impact of the project on the NSW economy.

Chapter 21 and Appendix U (nearly 300 pages in length) are intended to cover the Socio-economic assessment of the Beaches Link and Gore Hill Freeway Connection. However, there is NO attempt to assess the economic impact of the project. It is essential that the economic assessment of the project is provided to the parliamentary inquiry (and the public) and assessed in detail.

General

In terms of economic performance, the tunnel options for both projects need to be compared to the upgrading of rail and other public transport services. No assessment even of project cost could be found in the documentation for either project. It may exist, but is difficult to find. While it is accepted that current EIS guidelines do not enforce the need for cost/benefit assessment, we believe that a separate analysis should have been prepared, and made public. **If it has not been undertaken, it should now be top priority, and include comparison with public transport alternatives.**

It is noted that the Response to Submissions for WHT made no mention of rail alternatives. It is recognised that rail improvements are less relevant to WHT than to BL. However improved bus, train and metro services would have potential to reduce the level of peak-hour car use and the vehicle numbers seeking to join the Western Distributor.

(b) the adequacy of the consideration of alternative options

Totally inadequate. There was no consideration of rail or metro options for either project but particularly for BL.

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

Extremely high – estimated at \$14 billion for both tunnels but some estimates are as high as \$30 billion. We are not sure if this includes the Warringah freeway and Wakehurst Parkway upgrades. Clearly new and more detailed and accurate cost estimates are required and need to be made public.

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

What is even more important is the intended control of the tunnels in operation. The NSW Government has already lost control of metropolitan transport since, at a time of rapid technological change (for instance towards all vehicles being continuously connected to the internet and the possibility of policy-driven road pricing) policy is fundamentally distorted by the private operation of the most important links in the regional transport network. Building the tunnels to be private profit centres makes regional urban management an order of magnitude worse.

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

No comment

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

Stakeholder and community engagement is covered in Chapter 7 of each EIS which indicate that substantial community consultation was undertaken. However, there is not known to have been any substantial consultation with North Sydney communities though some of our members did attend a feedback session in Fred Hutley Hall. This did not really provide opportunity to object to the project concept.

Table 7-7 summarises stakeholder and community feedback. In total 273 comments (11%) in 2017/18 supported the project and 2302 (89%) opposed.

Table 7-8 lists the issues raised. However it would appear that many and maybe most issues have not been seriously addressed by the project designers.

The NSW Planning Portal provides all of the submissions made to the EIS team in 2020 by communities, organisations and public authorities. These responses are summarised in the table below.

	Supported	Commented	Objected	Total
Western Harbour Tunnel				
Community	18	87	1270	1375
Organizations	1	5	53	59
Public Authority	1	15	4	20
Beaches Link				
Community	39	120	1282	1441
Organizations	2	21	71	94
Public Authority	1	1	12	14
Total	62	249	2692	3003
Per cent	2%	8%	90%	100%

Support for both projects as described in their EISs was limited with only 2% of respondents supporting and 90% objecting – a worse ratio than in 2017/18. It is appreciated that this may overstate the proportion actually objecting, since objectors are more likely to make submissions than those supporting the project. However, the level of objections was high, and it is considered to be very negative that the EIS team failed to take account of most objections.

It is noted that TfNSW published a response to the negative comments in September 2020, extending to 412 pages.

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

The increased numbers of people likely to continue working from home will reduce peak hour demand for the tunnels considerably and will worsen the cost benefit ratio.

(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

YES. This information needs to be published, so that residents have a better idea of the effectiveness of government investments and the benefits or costs of taxation use.

(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

North Sydney Council's submission on the WHT EIS made a careful analysis of the information available to the public. It is clear from this that both EIS's offered no explanation of the chosen plan, no alternatives, no options, no financial analysis, no business case, no useful traffic forecasts, and no assessment of traffic impacts on North Sydney. This must place this project at the wrong end of the transparency and accountability spectrum.

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

Environmental issues will be great, particularly during construction with the harbour excavation and immersed tube method planned for both projects. In the medium term, environmental costs near the air extraction stacks at each end of the tunnels will be significant, but will decrease as electric powered vehicles become dominant.

While mentioning electric vehicles, it is noted that over time, road capacity will increase greatly due to self-spacing of vehicles which have the potential to increase road capacity by close to 100% thus reducing the need for major road upgrades.²

During the decades while diesel trucks and vans, in particular, are still using the tunnel, the level of air pollution is literally unknown. The NSW Chief Scientist commissioned a review of the Beaches Link EIS in relation to air quality. In the final paragraph of the report, the independent and highly qualified authors said, in effect, that the air quality predications were not based on evidence and could not be believed.

https://committeefornorthsydney.org.au/wp/wp-content/uploads/2021/06/210223_ACTAQ-OCSE-Beaches-Link-EIS-advice.pdf

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

See our response to TOR (i).

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

In North Sydney, construction will have substantial negative impact on both Balls Head and Balls Head and Bay roads, due to worker vehicle access, parking and the transport of excavated material.

² See for example <https://www.trafa.se/en/road-traffic/self-driving-cars---potential-development-and-impact-on-road-capacity-3583/> from Sweden.

There is a significant permanent loss of several hectares of parkland and recreation space at Cammeray Park. The proposals state that there should be no net loss of open green space – and yet North Sydney will lose out again.

Other factors

1. **Harbour Bridge tolls:** It is understood that there is a plan to charge northbound tolls on the harbour bridge and tunnel, to prevent increased usage by people trying to avoid the WHT tolls. This is considered to be highly unreasonable, unless the peak hour toll is reduced to say \$2 in each direction, compared to the current peak hour cost of \$4 southbound.
2. **Motorways and Cities:** almost every city in the world has stopped building city motorways and many are taking them out. The key issue is reported to be that motorway construction attracts more vehicles which can jam up other streets. It is however, noted that underground motorways are less damaging than above-ground due to the limited need to break up suburbs, though generally more expensive.

A search on Google for “positive motorways and cities” generated 1 million sites, while for “negative motorways and cities” generated 3 million, suggesting that around 75% of web articles do not support urban motorways. The main reasons are the breaking up of cities and generation of increased traffic in surrounding areas.

Inter-urban motorways can be valuable, to reduce driving time and improve safety.

3. **Public transport options** must be addressed as part of this proposal - Rail/metro/bus development options need to be considered as a serious alternative to the road tunnels program. It is noted that almost all European cities have been focussing on strengthening their public transport networks rather than developing new major roads.
4. It is recommended that an **origin and destination survey** now be conducted, if one has not already been undertaken. The results must be published and provided to affected residents and businesses. Development of the expected traffic flow and change over time is also required.
5. It is now universally accepted that **new road construction generates more traffic**, with negative environmental effects and impacts on other local roads. The current problems being experienced near the M5 following toll imposition need to be taken into account.
6. In addition to the rail option discussed elsewhere, consideration should have been given to imposing a vehicle tax on vehicles entering the Sydney City business district during peak hours at least, as introduced in London in 2003 and Singapore; also planned for New York. This would greatly reduce peak hour traffic and congestion.
7. It is recognised that an issue with the connection between the Harbour Bridge and Anzac Bridge or Wattle St is where the Western Distributor turns left off the three lane freeway going south. During evening peak hour, there are significant bottlenecks there. The WHT would reduce or eliminate this bottleneck. Ways to improve the link to Anzac Bridge will be highly desirable if the WHT is not constructed.

8. It is noted that one of the benefits of the WHT/BL projects is their link to WestConnex leading to increased usage and toll generation. In our view, the financial performance of the tunnel operator should be a minor factor in deciding whether or not to proceed with the projects.

Yours faithfully,

Milsons Point NSW 1565