

List of objections to the construction of the WHT and Warringah Freeway upgrade

I object to the WHT and Warringah Freeway upgrade on a number of grounds and I believe that the project should not proceed. On this occasion I agree with Mr Alan Johns who spoke on 2GB on the 19/3/2020 and again to Gladys Berijklian on 27/03/2020. No business case has ever been released as to why an extensive road only project was chosen over public transport options, or any other option other than a roadway. I request that the business case be released which outlined why the WHT and Warringah Freeway Upgrade has been chosen over all other options including an extension of the B-Line, a rail line from Dee Why to Chatswood and other public transport options.

Publish the business case

Publication of this business case is in the public's interest. As taxpayers we have a right to know how and why our taxpayer funds are being spent. The purpose of the infrastructure is to reduce congestion and ease traffic flow, however this is based on 2016 figures before the introduction of the B-Line buses. My understanding is that more roads mean more cars, increased pollution and increased traffic. A public transport option would move many more thousands of people per hour in comparison to numbers that can be transported via a road. Please release the business case.

I object to the project on cost grounds

The cost for the WHT and WF Upgrade is a dual project with the Beaches Link. The current cost is quoted as \$16 billion. According to Alan Jones this could blow out to \$20 - \$26 billion. As I understand if this project goes ahead, the amount spent on each resident in the Northern Beaches is \$53,000. This is an excessive amount per resident, in an area of Sydney whose population compared to Western Sydney is relatively stagnant. I also understand that there will be tolls both ways on the Harbour Bridge, as well as for the new tunnels and connections. Sydney already has the most expensive tollway system in the world. Not only do we have to pay for the building of this infrastructure as a taxpayer we have to pay as a user when we drive on the roads.

I object on the grounds of COVID 19, the EIS consultation period needs to be extended

As we are now bracing for the full impact of COVID 19 and still recovering from bushfires and floods our focus following the virus peak needs to be on rebuilding and improving infrastructure lost or damaged across the state. Upgrading rural and regional train lines could be a starting point. Money needs to be spent rebuilding the economy, spent on schools, hospitals and improved public transport not more roads. I note that in the Northern Sydney area Neutral Bay Public School which is the most overcrowded school in the state per square metre was set to be rebuilt into a state-of-the-art learning centre. At present there is not enough classrooms to accommodate the children that are currently enrolled. These plans have been shelved and a much lesser project at a third of the cost proposed, however the new proposal still does not accommodate the actual number of students who are currently enrolled at the school. Spend money on overcrowded public schools and regional infrastructure to stimulate the economy after the impact of COVID 19.

We need more time as upon initial review as it has become evident that this is a far larger project with much broader ramifications than we had understood from the Reference Design Plans. The EIS documents are lengthy (with over 9000+ pages including appendices) and complex. The community requested clarification on the Warringah Freeway changes and a new document was issued to clarify the complex descriptions in the EIS in early March 2020. The implications of reconfiguring the

Warringah Freeway alone (to accommodate two tunnels, ventilation outlets, ramps and flow management) are only now able to be fully understood. Schools across the route border the Warringah Freeway and many of our catchments cross it. The safety and welfare of children is of the upmost concern. The ramifications across the route, which runs along the largest school district in Australia are complex and I believe need proper and careful consideration in consultation with community.

The commencement of the school term coincided with the outbreak of the COVID-19 Virus. Since that time, school communities and parents (such as myself) have been increasingly busy developing measures and adjusting daily activities to best protect children and our communities. The crisis is having a huge impact on people's ability to engage with and understand this complex project. With a high proportion of working parents (often in jobs requiring travel) in the area the virus has presented a real challenge. My friends and neighbours have reported taking on extra responsibility at work to communicate and develop procedures, others have experienced constantly changing work/ travel arrangements which have impacted family and of course those that own small businesses have had to give them greater focus. Others have elderly or vulnerable family to care for, in addition to ensuring their children stay safe and well. As the weeks have passed and the threat has increased our families and community have genuinely had less time to devote to understanding the project and their emotional capacity to respond to the EIS is limited.

The cumulative impact of helping our children through the smoke impacts and distress of the recent bushfires, severe storm events and outages, followed by COVID-19 cannot be underestimated. Adding a wide ranging and high impact 5-6 year construction project (which carries well documented risk) is exacerbating anxiety for many and preventing genuine engagement and consultation.

In the light of all that has occurred this year and the complexity and impact of this project I ask that the RMS and Department of Planning formally suspend the EIS process (and that of the Beaches Link EIS) until after the virus crisis has fully passed and families are able to return to normal routines of life. A suspension is in the best interest of our community and our school children.

I request that any submissions lodged so far be brought forward to the final consultation time. The additional drop in sessions have not been able to be fully attended due to social distancing concerns, that these be re-instated at the time of re-release. I believe that that consultation would be far more participatory once the COVID-19 crisis has passed.

I object as my child's health, as a high school student at Cammeraygal High School, will be worse off during and after the completion of the project.

My son attends Cammeraygal Highschool. There will be a double unfiltered ventilation stack just over 600m from where my son attends school. This is unacceptable to have unfiltered stacks in longitudinal tunnels of this length and is unprecedented in the world – there are longer tunnels such in Switzerland but these tunnels have additional ventilation points.

The North Sydney area is already highly polluted and the unfiltered double stack will increase pollution levels as more cars use the infrastructure. My son is one of many school students in the North Sydney area – which has the highest concentration of school children in Australia. Our school children have the right to breathe clean air. As we know with the bushfires over the last summer there were many days where the air pollution was well in excess of recommended safe levels of air quality. We have a commitment as a nation to reduce our carbon footprint, not to increase it which the WHT and Warringah Freeway upgrade will.

I want it also noted that I object to the figures used to predict the impacts of the tunnelling and upgrades on the exposure of dust and pollution to school children in the North Sydney area. I object as they are incorrect. Each school, as stated in the EIS is estimated to have 100 children. The figures are readily available as to how many students are at each school in the North Sydney area so why were the figures used incorrect, therefore biasing the EIS in favour of the WHT and WF upgrade. I note in the EIS the children are referred to as "Community Receivers". Could you please amend the EIS and all of the results using the correct figures and that plain English is used – school children is more descriptive. Primary schools in the area have closer to 1000 children rather than 100, and this is also the case for the high schools in the area, in fact most are over 1000 students. If you could please inform me as to where the figures have come from that would be greatly appreciated.

I also note in the EIS the height of the stacks is only 20m, and this was chosen for aesthetic reasons. Information in the EIS models that there would be less pollution falling in the area if the stacks were 40m. There would also be less pollution if the stacks had best practice filtration.

I object to the number of support sites needed and scale of work required and major changes to road routes and access

The EIS states more than 6000 construction movements per day and night works are needed to keep the Freeway operational during the construction period. This will cause great disruption to the movement of traffic from where I live to North Sydney and the city and will also disrupt my son's journey to his high school, as well as force construction traffic and local traffic on to local streets, which is unsafe for pedestrians. In North Sydney there are already pedestrian crossings that are at a fail level. How will this be mitigated and pedestrians and cyclists and all road users kept safe and moving. Please provide a plan for

There 11 Construction site locations sites documented in the EIS. The Truck and Parking numbers have been added from the EIS Information Booklet and Construction Chapter. Merlin St and Cammeray Golf Course site (with exit on Earnest St) will have a considerable impact on traffic flows during construction. Parking spaces will be lost due to access to sites and thousands of workers will look for parking across the area with the greatest number in and around Cammeray Golf Course. This site will see approx. 2000 construction vehicle movements per day with a support site at Merlin St which will see 150 vehicle movements per day. Vehicles will enter and exit via Earnest St and Warringah Expressway. With limited public transport to this location it is likely that local streets across Neutral Bay and Cammeray will be utilised by construction staff. Construction sites at Ridge and High St's will also likely create rat runs up Ben Boyd Rd to avoid considerable construction impacts/ changes at High St and Ridge St.

The EIS States the following intersections will experience delays with construction traffic, intersections that operate with a poorer Level of Service compared to without construction traffic include during the 5-6 year construction time frame:

- Willoughby Road/Gore Hill Freeway interchange (morning and evening peak)
- Brook Street/Warringah Freeway off ramp (morning peak)
- Amherst Street/West Street (evening peak)
- Amherst Street/Miller Street (evening peak)
- Miller Street/Warringah Freeway off ramp (morning peak)
- Miller Street/Falcon Street (morning peak)
- Military Road/Ben Boyd Road (evening peak)
- Mount Street/Arthur Street (evening peak)
- Pacific Highway/Berry Street (evening peak)

- Pacific Highway/Bay Road (morning peak)
- High Street/Alfred Street (morning peak)
- Ernest Street/Ben Boyd Road (morning and evening peak).

See Page 179. <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-8863%2120200116T053358.379+GMT&fbclid=IwAR39pri8c43N3qKt6mOKDby-q4FkMwitOZl3Zn8Vma3cQsUIMT4WEKGi9DY>

I object to the project due to the dust Impacts

There is the potential for dust emissions to contain contaminants mobilised through the disturbance of contaminated soils, and other hazardous materials (such as asbestos fibres or organic matter) during demolition of buildings and other structures. These issues would be considered on a site-by-site basis, and would be adequately managed through standard air quality mitigation and management measures.

Areas identified as containing contaminated soils and other hazardous substances, which may be disturbed during construction include:

- Rozelle Rail Yards, Rozelle
- Birchgrove peninsula, Birchgrove
- Balls Head peninsula
- Warringah Freeway, North Sydney to Cammeray
- Waltham Street, Artarmon.

Neutral Bay School school for example and playing fields such as where my son plays soccer at Cammeray oval fall into Zone 5 for Dust Assessment which is rated as High Risk. This is unacceptable and I object to the project for this reason as well.

I object to the project due to air quality considerations

The key air quality considerations for the project are likely to be:

- Understanding in-tunnel air quality and the short-term exposure of tunnel users to elevated pollutant concentrations. This relates not only to the exposure of Western Harbour Tunnel users, but also to the cumulative exposure of users of multiple Sydney tunnels, and notably WestConnex and Beaches Link
- Understanding the ambient air quality impacts of the tunnel ventilation outlets and changes to the surface road network. This includes:
 - Potential improvement in air quality alongside existing surface roads which would have a decrease in traffic volume as a result of the project
 - Potential deterioration in air quality alongside new and upgraded/widened surface roads forming part of the project
 - Potential deterioration in air quality alongside existing roads which would have an increase in traffic volume as a result of the project
 - Potential deterioration in air quality in the vicinity of the tunnel ventilation outlets
 - The combined impacts of multiple road infrastructure projects in Sydney
- Accurate modelling of air quality to inform tunnel ventilation design and management
- Public understanding of air quality and the magnitude of any project impacts
- Construction impacts of the project.
- Above standards for maximum 24Hr PM 2.5 – every receiver in the study range is predicted to be more than double the national standards. Given the very serious and wide-ranging risks to children's health poor background air quality (confirmed by this EIS study) is not an excuse to

add more pollution no matter how small the contribution added. This is also an indication that traffic is not substantially reducing.

- Increased NO₂ 1 hour Mean Concentrations appear to get significantly worse if only Western Harbour built but better if Beaches Link built. It's not clear how it is possible for other pollutants to get worse and seems inconsistent with PM values unless it's based on vehicle mix...this is worth querying. It may be due to an assumption that we are moving to Euro 6 standards which we aren't as that has been knocked back by the government Annexure A page 81 states: "In the case of heavy-duty vehicles the Euro V standards are currently being implemented in Australia, and the Euro VI standards are currently under discussion. Although the Euro VI standards will reduce the limit on NO_x emissions by 77 per cent relative to Euro V, and by 89 per cent relative to Euro IV, advanced test protocols that improve real-world conformity to NO_x limits should result in reductions that are closer to 95 per cent (Muncrief, 2015)."

I also object to the project based on the information below and that in Australia we do not have the same standard of emission control as Europe

- Non-exhaust processes were the largest source of road transport PM₁₀ (71 per cent) and PM_{2.5} (57 per cent). This is a larger proportion than in, say, most European countries, as there are relatively few diesel cars in Australia. It is also a cause for concern, as there are currently no controls for non-exhaust particles (and no legislation), and emissions would increase in line with projected traffic growth. Heavy-duty diesel vehicles are disproportionate contributors to NO_x and particulate matter emissions due to their inherent combustion characteristics, high operating mass (and hence high fuel usage) and level of emission control technology (NSW EPA, 2012b).

Page 219 – The concern is that many schools sit at high elevations compared to the stack. The stack is 30mtrs from ground level within the Warringah Expressway if only 20 metres is above ground height from the schools this could mean drastic increases in pollution compared to the graphs provided. This needs to be queried strongly as consequences are significant. The fact that these sensitive receivers are the only ones selected for sensitivity analysis indicated that they are the most sensitive. Following there is also an admission that our buildings were not included in the core analysis and therefore add additional impact.

Regarding the dispersion zone these calculations themselves suggest that Neutral Bay and Cammeray will be impacted by pollution.

I object to the project due to increased noise levels

One recreational receiver in NCA 26.2 is predicted to be noise affected by up to 18 dB(A) in Cammeray Park for instance

I object to the loss of green space in the North Sydney area

As I have been walking around my local area, through the bush I have come across many other people walking through these areas as well. These areas are needed and need to be expanded. In the time of this pandemic we need social distancing and we need our green space more than ever. I note that the loss of green space outlined in the EIS is not going to be reinstated after the project has been completed. I object to the loss of any green space in North Sydney which already has a very low rate of green space per resident in the state. St Leonard's Park, the area behind the greens,

Cammeray Golf Course which is on crown land the green spaces that are listed as construction sites. Sheds being above ground rather than underground at Cammeray Park and Cammeray golf course.

I object to the job ads that are currently being advertised for the project (closes 5 April), when the project has not finished the consultation and the project is still unapproved

The adds are for the following positions on a project this is not approved or budgeted for

- Senior Executive Director – Commercial lead WFU
- Senior Executive Director – Delivery lead WFU
- Senior Executive Director – Commercial lead Western Harbour Tunnel
- Senior Executive Director – Delivery lead Western Harbour Tunnel
- Scheduling manager – Western Harbour Tunnel

For all of the above reasons I object to the building and construction of the Western Harbour Tunnel and the Warringah Freeway Upgrade.

Kind regards

Kristina