



17 August 2023

Ms Ingrid Berzins
Planning Officer, Social and Other Infrastructure Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

By email to ingrid.berzins@planning.nsw.gov.au

Dear Ms Berzins

Re: North Sydney Council Submission to Mod 2 of Western Harbour Tunnel (SSI 8863)

Please find below submissions from North Sydney Council regarding the Modification report for the Warringah Freeway Upgrade (WFU) and Western Harbour Tunnel (WHT).

Background

It is important to note that the Warringah Freeway Upgrade and the Western Harbour Tunnel projects are approved under a single planning SSI approval. Therefore, any amendment applies equally to both projects covered by this single approval (ie. it is one project). This submission addresses outstanding concerns regarding negative impacts stemming from the project.

The following issues have been identified as being relevant to the North Sydney Community and Council.

The Continued Loss of Open Space at Cammeray

The project at present maintains control over 16,000 m² of Cammeray Reserve. This land is occupied by the operations building for the WHT and a potential future operations building for the Beaches Link. This land is further alienated from the accessible open space of Cammeray Reserve.

This lost open space should be restored to public use by putting the operations building underground and by removing the roadway connecting the operations area to Ernest Street and instead utilising the proposed entry/exit directly to/from the Warringah Freeway.

The restoration of this significant open space to public use will assist in meeting the requirement that there be no net loss of open space (SSI 8863, Condition E184).

Impacts on the North Sydney CBD with respect of the use of Berry Street

The Western Harbour Bridge continues to rely on Berry Street to funnel cars into the WHT. This will increase traffic flow along this congested road and will include removal of curb blisters and delivery zones for adjacent office towers.

The proposed use of Berry Street to facilitate traffic to the tunnel is incompatible with the aims and intentions of the Metro Victoria Cross plans and with the North Sydney Integrated Transport Plan (NSITP). These projects provide very significant benefits to the functionality and amenity of the North Sydney CBD which will be degraded by the WHT use of Berry Street. It is noted that the development of the Ward Street precincts north of Berry Street will add approximately 100,000 m² of office space over the next ten years. The use of Berry Street will undermine the benefits inherent in the Metro project and NSITP. The project should be amended to provide for traffic entering the WHT to go around the CBD by using the Pacific Highway and Arthur Street. This would allow optimal public benefit for both North Sydney CBD and the road network.

Impacts on Local Traffic and Road Network

Traffic congestion has noticeably increased throughout the local road network including on Miller and Berry Streets. Severe disruption is being experienced by residents using the local road network around Alfred Street North, Ernest Street, Arthur Street and elsewhere.

The works have resulted in the loss of more than 250 parking spaces, approximately half of which are permanent losses. Despite the requirements of the approval to mitigate lost parking there have been no tangible relief measures introduced. This degree of impact in affected areas is untenable and should be rectified in the amendment report.

Council is prioritising other modes of transport like public transport, walking, and cycling throughout the urban renewal areas to encourage a mode shift away from private vehicle transport. The road project should be directly responsible for providing infrastructure and resources to facilitate mode shift and other measures to alleviate transport pressures.

Failure to adequately address Active Transport

Active Transport initiatives have been absent from the planning and implementation of the road project. Active Transport is an important tool in addressing the short and long-term negative impacts on road and transport options resulting from the SSI. The SSI modification should be amended to require a more tangible improvement in transport options and travel mode shift.

The North Sydney Integrated Cycling Strategy has identified a fully separated cycleway along the Pacific Highway, between West Street and Arthur Street, as a priority route. Since the Strategy's creation in 2014, there have been numerous attempts to design this section of cycleway, including a proposed pop-up during the COVID pandemic. This should be delivered as part of SSI8863 - Warringah Freeway Upgrade and Western Harbour Tunnel.

Additionally, it is important that a viable Active Transport connection from the Sydney Harbour Bridge to St Leonards Park is provided. Walking and cycling has benefits for young people. Safer walking and cycling routes to and from schools encourage young people to ride from an early age, instilling healthy habits and reducing sedentary lifestyles and provide an alternative to private vehicle travel. Cycleways support the delivery of NSW Health's aim to increase children travelling to school by active transport to reduce obesity and chronic disease rates in our children.

There have been inadequate measures to address the specific needs and preferences of North Sydney residents. This is a departure from the NSW Government's commitment in 2021 to continue working with NSW councils to support the delivery of new and improved bike riding infrastructure.

Environmental Impacts

The modification report states that the proposed change in methodology will reduce the required recording and monitoring of marine environments. Concern is raised that the depth of the tunnel will only be approximately 10-12m below the seabed in Berrys Bay and the Coal Loader wharf seawall. This raises a heightened chance of damage to the Coal Loader's infrastructure and increased danger of disturbing contaminated silts in Berrys Bay.

The issue of pollution from ventilation stacks has not yet been satisfactorily addressed. Concern remains regarding particulate emissions being vented at Cammeray without being filtered to best practice standards. It is requested that the vent exhaust be filtered.

It appears that despite the change in methodology, from the information provided thus far, the tunnelling remains relatively close beneath the foundations of the Coal Loader Platform. Council continues to have strong concerns with the potential vibrational and settlement impacts on the Coal Loader platform complex, which is a relatively fragile heritage structure (largely non-reinforced concrete and sandstone masonry, over 100 years old). Council objects to any removal or weakening of the existing conditions of approval related to undertaking pre-construction surveying and recording; assessment and monitoring of the impacts; negating and/or rectifying the consequences of these impacts to the Coal Loader.

Works are proposed under the Berrys Bay Masterplan to the marine environment of Berrys Bay, including seawall upgrades and a new wharf/jetty structure. As this may impact on aquatic flora and fauna, Council objects to any removal or weakening of the existing conditions of approval related to undertaking pre-construction surveying and recording; assessment and monitoring of the impacts; negating and /or rectifying the consequences of these impacts to the marine environment of Berrys Bay.

From the information provided it appears that the burial chamber is relatively close (at the eastern end of the chamber) beneath the lower flat section of the former BP oil storage depot site (working waterfront) site. As this site may have remnant contamination within the bedrock strata to be excavated, and the location of the chamber appears to be within the ground-water zone, Council objects to any removal or weakening of any of the existing conditions of approval for this site related to assessing and monitoring the nature of the contamination, potential impacts to groundwater quality and associated impacts to the waters of Berrys Bay through the groundwater. In addition, as the chamber is a newly proposed component of the project, suitable additional conditions should be considered that deal with its specific impacts.

As both the Coal Loader and the Berrys Bay sites are of high heritage significance and of immense value to the community, Council objects to any removal or weakening of any of the Heritage-related existing conditions of approval for these sites.

The proposed burial chamber for the tunnel boring machine (TBM) under the Waverton Peninsula, from the information provided thus far, appears to be run beneath the Aboriginal whale engraving site (at the western end of the chamber). Whilst the top of the chamber excavation appears to be a considerable depth beneath the engraving rock, Council is concerned that, given the expected settlement and vibration impacts, the excavation of the chamber may cause damage to the engraving site. Appropriate conditions of approval need to be included that address these potential impacts. Furthermore, the conditions of consent need to require that the proponent consult with representatives of the Aboriginal community (including but not limited to the Aboriginal Heritage Office and the Metropolitan Local Aboriginal Land Council) as to any concerns they may have with excavation beneath the engraving rock and the proposal to leave parts of the TBM beneath the engraving rock in perpetuity.

Should you have any questions regarding this submission please contact Gavin McConnell, Public Project Interface Manager, on 02 9936 8481.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Manns', written in a cursive style.

Therese Manns
GENERAL MANAGER