91 Eddy Road,
Chatswood 2067
28.3.2020

Attention: Director, Transport Assessments
Planning & Assessment, Department of Planning
Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Objection: Western Harbour Tunnel and Warringah Freeway Upgrade - SSI-8863

I write to express my objection to the Western Harbour Tunnel and Warringah Freeway Upgrade. I have done my best to read the extensive EIS documents at this very difficult time. I have significant concerns about the justification for this project particularly given that there is no published business case, it is not high on Infrastructure Australia's priority list and that the EIS demonstrates a significant risk to health and safety while delivering poor outcomes.

My objections include the following points:

1. This project being placed on exhibition during the COVID-19 Crisis. This project impacts the largest precinct of schools in Australia and passes through highly residential areas. Families, community groups and schools have been under a huge amount of strain throughout the exhibition stage. Meetings have had to be cancelled and we have been social distancing as instructed. Trying to read these documents has created more community anxiety. The project should be re-exhibited well after the COVID-19 crisis has passed and when normal life returns.
2. The project should not proceed because of the financial implications. Lack of government investment in essential public services was clearly demonstrated to the public during the national bushfires 2019-2020 when fire, RFS and emergency services could not cope with the fires largely due to inadequate investment by governments. The lack of investment in funding, maintenance and management of national parks was a contributing factor to the fires. Currently the inadequate funding of NSW public hospitals has resulted in lack of protective equipment, inadequately equipped intensive care units and under-staffing. The NSW government must abandon this wasteful harbour tunnel proposal and properly invest in the public sector, for effective public services, emergency services, hospitals and community services in the public interest, to benefit the wider community
3. When the world needs to decarbonise, we should not continue to support other carbon based energy sources with clear and immediate impacts on this case water and biodiversity.
4. Poor climate and sustainability outcomes and the negative impact on our precious waterways and green spaces. The Concept of Citizens Right to Health inherent in the Paris Climate Agreement to which Australia is signatory should be explored in the context of the proposed road tunnel, which will create air, water, land pollution through excavation, and more pollution from facilitation of more traffic on roads. This is contrary to the health and well-being of citizens and the environment.
5. Protecting Sydney Harbour's water quality needs to be a top priority. Toxic sediments derived from past industrial activities and storm water overflows, have built up on bottom of the harbour. A range of chemicals can be found in these sediments including dioxins, heavy metals and pre- and poly-fluoroalkyl (PFAS) chemicals. These sediments, if mobilised into the water column, can severely degrade the harbour's water quality and pose significant risks to public health and marine biodiversity up and downstream of the construction activities.
6. Previous testing by the NSW government revealed elevated levels of dioxins in fish and crustaceans across Sydney Harbour and consequently imposed a ban on all commercial fishing. Restrictions on recreational fishing are in place with clear advice that no fish or crustaceans caught west of the harbour bridge should be ingested because of the contamination and risks to health. Toxic sediments can effect those swimming in the harbour or ocean pools fed by Sydney harbour waters. Dioxins are known carcinogens which can cause birth defects while PFAS can cause reproductive and immunological effects in laboratory animals. Minimising toxic sediments on the bed of Sydney Harbour being released into the

water column is therefore critical. The removal of approximately 140,000 cubic metres of toxic sediments during planned construction is risky. It would require stringent management, monitoring reporting and fines for breaches. No reduction of water quality and full community use of the harbour must be paramount principles.

7. In the public interest I believe the following recommendations should be adopted if the controversial tunnel proceeds: a) Public release of exact concentrations of chemicals in the sediments. It is understood these are 'commercial in confidence' at present, but, in public interest , transparency is needed to ensure that the severity of the risk to the public can be scrutinised by a range of stakeholders, not just the state government. b) Councils on the harbour must be immediately alerted when water quality is effected to enable councils to immediately alert their communities about the public health risks of swimming, and to implement immediate controls for maintenance of ocean and harbour pools and beaches. These costs should be born by the government. c) Provide water quality data for use in the Greater Sydney Harbour Coastal Management Program (CMP).
8. Minimise effect on Marine Biodiversity: Mobilising toxic sediments will likely have detrimental effect on water quality and consequently marine biodiversity living in and around the harbour. Mobilised toxic sediments could affect availability and suitability of food sources for threatened biota including the Little Penguin and White bellied sea eagle. Other marine species including Black Rockcod, New Zealand Fur Seal and Whites Seahorse may be adversely effected by the proposed project.
9. Poor Traffic and Congestion outcomes. The proposed tunnel will empty thousands of extra motor vehicles into Naremburn and the lower north shore generally.
10. Air quality and Health:

Clean air is considered to be a basic requirement of human health and well-being. However, air pollution continues to pose a significant threat to health worldwide. The World Health Organisation (WHO) assessed the burden of disease due to air pollution, that more than 2 million premature deaths each year can be attributed to the effects of urban air pollution(WHO 2005).

Increasing population density and car dependency has resulted in poor air quality. Lead free petrol & improved emissions standards have resulted in reduction airborne lead and emissions, but the number of cars, kilometres travelled, and traffic congestion have increased.

Air pollution is exacerbated by heatwave conditions. During the Melbourne heatwaves 4+ years ago, emergency services were called out every 12 minutes hence Emergency Departments and ambulance services were stretched to capacity.

Clean air is a common good: In Paris (May 2019) a court ruled in favour of mother & daughter who claimed deterioration in health due to air pollution that "The state (France) committed fault by taking insufficient measures concerning air quality'. The case, backed by an NGO was the first brought by individuals against the state over health problems due to air pollution, that 'during 2012 & 2016 the 'state failed to take sufficient action to curb air pollution in Paris.

Evidence on airborne **particulate matter** (PM) and public health impact is consistent showing adverse health effects at exposures currently experienced by urban populations in both developed and developing countries. The **range of health effects is broad, predominantly respiratory and cardiovascular systems.** All populations are affected, but susceptibility to pollution may vary with health or age, **particularly young children and the elderly.**

Risk for various outcomes increases with exposure, with little evidence to suggest a threshold below which no adverse health effects would be anticipated. The low end of the range of concentrations at which adverse health effects has been demonstrated is not greatly above the background concentration, which for particles smaller than 2.5 μm (PM2.5) has been estimated to be **3**–5 μg/m**3** in both USA and western Europe (WHO 2005).

Nitrogen Dioxide (NO2): air pollutant: Animal and human experimental studies indicate NO2 at short-term concentrations exceeding 200 μg/m**3** is a toxic gas with significant health effects. Epidemiological studies have shown bronchitic symptoms of asthmatic children increase in association with annual NO2 concentration, & that reduced lung function growth in children is linked to elevated NO2 concentrations within communities already at current North American and European Urban ambient air levels. Recently published studies demonstrated that

NO2 can have higher spatial variation than other traffic-related air pollutants, for example, particle mass. These studies also found adverse effects on the health of children living in metropolitan areas characterized by higher levels of NO2 even where the overall city-wide NO2 level was fairly low.

Recent evidence of poor air quality in St Peters includes higher levels of fine particulate matter PM 2.5 than other parts of Sydney, apart from other WestConnex sites in Haberfield. PM 2.5 is known to be dangerous to health, especially that of small children, pregnant women, older people and those with heart and lung conditions. When WestConnex opens there will be unfiltered exhaust stacks within a few hundred metres of schools, and preschools. Over three months, all eight new M5 monitors are currently showing an average above 8 micrograms per cubic metre or 8 µg/m3, which is the national annual average limit. The three St Peters monitors are showing an average of above 10 µg/m3. Medical research has found there is no safe level of PM 2.5. Health risks increase as levels rise. PM 2.5 has been linked to cancer and heart and lung disease.

The NSW government should not further risk the community health of residents by the construction of the tunnel and increasing traffic pollution..
The Heart Foundation suggests optimal design approaches that encourage active living in the areas which should be explored instead of the proposed tunnel to benefit our local communities:

- walking & cycling routes
- streets
- local destinations
- open space
- public transport
- supporting infrastructure
- fostering community spirit.

In summary
'Tunnel vision or rail opportunity': There are serious concerns that the proposed Northern beaches tunnel to link with Westconnex via the Harbour tunnel demonstrates staggering lack of vision and poor planning. Having observed the disastrous planning associated with the controversial Westconnex, many hold fears around possible cost blowouts, pollution events effecting water, land, air quality, and detrimental local effects from construction. The construction and operational risks are far too high for residents and school children along the route

Efficient public transport systems are desperately needed for a sustainable global city. If the government is determined to proceed with a costly tunnel, it must ensure the proposed tunnel is used ONLY for public transport, preferably rail, using visionary Bradfield plans for rail to the northern beaches as a concept guideline. Tunnels are already in place at North Sydney station.

This project is a missed opportunity to transform Sydney into a world class, healthy and sustainable city with a strong public transport system. I request that an alternative public transport feasibility study be published before any further planning occurs so that impacts and outcomes can be fairly compared.

Yours sincerely,

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