

Dear Sir/Madam

OBJECTIONS TO THE WESTERN HARBOUR TUNNEL (WHT) AND WARRINGAH FREEWAY UPGRADE (WFU) – APPLICATION SSI-8863

My name is Gavin Kent and I live in Cammeray with my wife and two young daughters and have lived in the suburb for the past 16 years. We choose to live in Cammeray partly because of the access to green space and because of the pedestrian friendly streets.

I am opposed to the WHT & WFU largely because our suburb will lose public green space, local streets will become more congested and less safe for pedestrians and because of the increase in air pollution which would result.

I strongly object to the project on the following grounds -

Permanent Loss of Green Space

I object to the permanent removal of 2.6 hectares of Public Recreation Green Space at the Cammeray Golf Course/ Cammeray Park for the widening of the freeway and to house two permanent industrial sheds. The North Sydney LGA already bears the distinction of having one of the highest numbers of people per head of hectare in the greater Sydney region. There should be no permanent net loss of green space as a result of this project.

The population of the North Sydney LGA is increasing. It is incumbent on the state government and its agencies to meet the green space needs of both existing and future generations in order to make this project sustainable. The lack of green space in the Nth Syd LGA has been identified by the local council as a growing problem particularly in relation to sporting groups.

The Cammeray Golf Course is public green space, which under Crown Land Management Act 2016, has been vested to the local council to be used as a public reserve. The destruction of this public green space would flout the intention of the act and the principles of Crown Land Management.

Two prominent examples of crown land in Sydney are Hyde Park and Bondi Beach.

If it were proposed that a significant part of these two public spaces were to be used for the construction of a motorway the public would rightly be outraged. The public will be outraged at the proposal to use public green space in Cammeray for a motorway.

CONDITIONS OF APPROVAL

- **I recommend -**
that there be no net loss of green space as a result of the project;
- that to compensate for loss of public green space in Cammeray park that land bridges be built for parkland (exceeding 2.6 hectares) across the freeway from Cammeray Park to Anzac Park, and from Anzac Park to St Leonards Park, as a facility for pedestrians, cyclists and recreation; AND
- that the industrial sheds be built underground, utilising the natural fall of the land from Ernest Street through Cammeray Park. Industrial sheds of this nature are routinely placed underground in major road projects overseas e.g. Hong Kong.

Air Pollution from Unfiltered Emissions from the WHT and WFU

I strongly object to the EIS because the proposed tunnel at 6.5 km is too long for the type of ventilation proposed and does not use international best practice in its tunnel and stack ventilation proposals.

North Sydney will receive the full discharge from the Western Harbour Tunnel via a single emission stack, located in Anzac Park, close to Anzac Park Public School, in Cammeray.

In particular -

1) I object because the proposed tunnel is too long for the type of ventilation proposed and does not use World's Best Practice in the design of the filtration system.

2) I object because the proposed longitudinal ventilation is known to be substandard in controlling tunnel vehicle emissions for tunnels longer than 4km. For example, Tunnel pollution levels of the M5 tunnel beyond the airport have been a major concern for years. Filtration is now being trialled.

3) I object because the EIS fails to take into account known problems and in particular ignores the recommendations on filtration for new Tunnels made by the 2018 Joint Parliamentary Inquiry into WestConnex.

4) I object to the underestimation of pollution levels in the EIS due to the non-adoption by Australia of Euro6 fuel standards, which the modelling is based upon. All suburbs of the North Sydney LGA are modelling to have increased air pollution levels, yet many already exceed the Australian standard.

5) I object because the unfiltered ventilation stack would not allow hazardous vehicle emissions to dissipate, partly because of nearby tall buildings, and they would instead largely settle over the surrounding suburbs exposing residents to toxic and carcinogenic emissions. Large numbers of residents would be affected by this dangerous pollution because the Nth Sydney has a very high population density of 6,207 people per km2.

6) I object to the lack of stack filtration because the World Health Organisation has declared that outdoor is already a leading environmental cause of cancer deaths. The NSW government states - "Air pollution is a persistent concern in the capital cities of Australia. Continued exposure to high levels of common air pollutants such as ozone (O3), oxides of nitrogen (NOx), carbon monoxide (CO) and particulate matter (PM) can result in serious health impacts, including premature death and cardiovascular and respiratory diseases. Those particularly susceptible are the very young, the elderly and those with pre-existing health conditions."

<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Air/air-pollution-economics-health-costs-greater-sydney-metropolitan-region-050623.pdf>

7) I object to the lack of planning to manage the unintended consequences of noise and dust

during the very long construction phase of 5 to 6 years.

CONDITIONS OF APPROVAL

I recommend that-

- full air filtration of all ventilation stacks be carried to provide the best possible protection to human health in line with world's best practice;
- ventilation stack machinery be placed underground;
- a dedicated underground bus loop to service railway stations in the NS LGA be constructed;
- World's Best Practice filtration techniques because of the long length of the tunnel and the predicted heavy traffic volumes, particularly trucks and diesel vehicles;
- transverse treated particulate filtration through tunnels (not just at the end in the stacks) be installed
- the use of truck convoys during the construction phase so that individual streets could be opened (and closed) at reasonably predictable and nominated times, enabling local residents to plan accordingly AND
- shuttle bus transport to work sites and designated on-site parking for workers be provided so that local businesses and residents would not lose access to their on-street parking.

Traffic Problems and Pedestrian Safety

The North Sydney CBD and the North Sydney LGA will be negatively and permanently impacted by the proposed project in terms of pedestrian safety and road traffic congestion.

Pedestrian Safety

I object to the project because The North Sydney Council has dedicated many years and millions of dollars towards making the NS CBD more pedestrian friendly and this project would create a traffic scar through the heart of the CBD in Berry St and undo much of the council's good work.

The North Sydney LGA has the highest concentration of schools in Australia and many are located within the CBD. The proposal to funnel more cars onto North Sydney streets reduces pedestrian amenity and safety for students and workers.

The project would hinder access to public transport, including the new Metro Station, and discourage sustainable transport choices.

Road Traffic Congestion

Construction Phase

I object to the large volume of 24/7 heavy truck movements through the lower north shore, particularly in the Cammeray and north Sydney areas for a very long period of 5 or 6 years. Many of these noisy truck movements would be during the sensitive night-time hours and would disrupt the sleep of residents.

The NSW Department of Environment states that....

"Chronic sleep disturbance is harmful to both physical and mental health....".

The emissions from the many diesel truck movements through the local area would be significant. Diesel is a Class 1 carcinogen and a high risk to human health.

Operational Phase

I strongly object to the WHT EIS because the traffic impact on both major roads and local streets would significantly and permanently deteriorate.

The EIS shows the performance of many key intersections along the Pacific Highway, Miller Street and Military Road would be downgraded to the lowest rating possible - 'F' rating, meaning that traffic flow could not be any worse at peak hours, for example -

Miller St and Falcon St intersection

Miller St and Berry St intersection

Miller St and Ernest

Miller St and Amherst Street

Pacific Highway and Bay Rd

Pacific Highway and Berry St

Military Rd and Ben Boyd Rd

Suggested Mitigation Measures -

An urgent review of the proposed traffic system flows detailed in the North Sydney Area particularly streets like Pacific Hwy, Miller St, Berry St, Falcon St, Ernest St be undertaken.

Investigate alternative options to funnel traffic into the tunnel other than through Berry St North Sydney eg: the intersection of the Pacific highway, Arthur Street and High street in North Sydney.

There should be no loss of local traffic connectivity within North Sydney, such as the existing Berry Street to Miller Street or the Berry Street to Falcon Street eastbound and westbound connections.

Construction Phase

1) During the construction phase implement truck convoys so that individual streets can be opened (and closed) at reasonably predictable and nominated times, enabling local residents to plan accordingly.

2) Provide shuttle bus transport to the work site and designated off-site parking for workers so local businesses/ residents do not lose access to their on-street parking.

Operational Phase

1) Create dedicated bus lanes in Blue and Miller Streets in order to facilitate the flow of public transport.

2) Ensure that pedestrian access and amenity is improved in the streets of North Sydney , not made worse as proposed in the EIS, such as short crossings at intersections; keeping parked cars in the

streets to separate traffic from footpaths and the planned re-introduction of two-way traffic flow in Berry Street.

3) Create land bridges across the freeway to facilitate 'green grid connectivity' and new walking paths, cycle ways, sports fields and parklands.

4) Construct a steady angle cycleway from Falcon St/Military Rd to Milson's Point.

Sustainability

I object to the WHT and WFU because the project does not meet the definition of sustainability in the EIS - **"development that meets the needs of the present without compromising the ability of future generations to meet their own needs"**.

The project fails to meet this definition because it is a massive road project which encourages the least sustainable and least efficient form of people transport - the motor vehicle.

I also object to the EIS because -

1) It has failed to consider and weigh up the sustainability benefits of public transport options.

2) It has not considered and taken into account the NSW state Government's commitment to an objective of achieving net-zero emissions by 2050 and the commonwealth government's Paris Agreement target of a 26-28% reduction in greenhouse gases below 2005 levels by 2030.

The WHT would not work towards achieving these goals and commitments and would impede the government from achieving them and is therefore unsustainable.

3) The EIS has failed to demonstrate that it meets the needs of the current and future generations because -

Over the long term this project would lead to increased traffic because of induced demand and any benefits to traffic congestion would be short term, particularly in light of a fast growing population in Sydney.

The project would expose current and future citizens to hazardous levels of vehicle emissions from a long road tunnel utilising unfiltered emission stacks. A planning document prepared for the NSW government in 2017 explored the risks of breaching air safety and said that. "The dispersal of pollution is hindered by tall apartment buildings less than 20 metres away. Background pollution in North Sydney is also elevated by nearby freeways, and the report says the project may cause "cumulative air quality impacts".

The project would decrease green space for present and future generations contrary to NSW state government vision and policy. Sydney has an increasing population and requires more, not less, green space. The project would conflict with the policies and visions of the NSW state Government, the NSW Department of Planning and the Greater Sydney Commission as well as the state government's Greener Places vision and policy.

EG. NSW Dept. Planning

"Our programs are focused on delivering two important Premier's Priorities that will help make NSW a more resilient and liveable place:

Provide greater access to quality, green, open and public spaces closer to homes

Increasing the tree canopy by planting one million trees in Greater Sydney by 2022

CONDITIONS OF APPROVAL

I RECOMMEND THAT

1) Sustainable public transport options be considered as an alternative to this toll road tunnel project

2) Filtration stacks be filtered

3) That there be no net loss of green space

Sincerely Yours

Gavin Kent

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Cammeray 2062