

**Stop the Tunnels (Public Transport not Toll Roads)**  
**Submission re: Beaches Tunnel and Gore Hill Link EIS**

**Who are we:** Stop the Tunnels is a community based advocacy group based on the Lower North Shore. We are made up of local representatives of the community who became concerned about the impacts of the Western Harbour and Beaches Link Tunnel after reviewing the EIS. We currently have 1004 followers on facebook and regularly engage the community to share information and advocate for better options. In July last year we helped the community to submit a petition to parliament which included 11,000 signatures asking for the projects to be reassessed. Following the close of the Western Harbour Tunnel and Beaches Link EIS we organised a letter campaign that helped the community write more than 3000 letters to our State Parliamentarians. It is disappointing to note that despite the community advocating for better outcomes, to date, no substantial changes have been made to the project to mitigate risk and alleviate community concern. The projects really are all pain, no gain for the Lower North Shore. We believe on the balance of the evidence that mass transit alternatives would provide a far greater long-term benefit, would be more cost effective and present less risk than the current alignment, methods and transport solution proposed. The reasons for this conclusion are attached.

**Our position:** We object to the project until such time as a comparative alternative transport study is completed that demonstrates the relative superiority of a toll road solution to a mass transit solution.

**Top Reasons why the WHBL Toll Road Tunnels won't work:**

**1. Local Traffic Gets Worse:** Most traffic using Warringah and Military Road have local trip origins and destinations. At 49.3%, Northern Beaches employment containment is the highest in the North District, much higher than in North Sydney, Ryde and Willoughby, which are 25.6%, 27.1% and 25.5% respectively<sup>1</sup> This project appears to be predicated on the assumption that more people (perhaps new residents?) will work in the city. On the North Shore, the significant changes in flow management outlined in the WHTWTFU and BL EIS's make access and egress from the expressway considerably more difficult for locals creating increased traffic delays as evidenced by the intersection failure rate outlined in the EIS and issues raised in the North Sydney and Willoughby Council Submissions to the WHT. The surface level traffic has not been mapped according to the EIS Operational Model along Willoughby Rd, Eastern Valley Way and the full length of Military Rd so it is unclear how travel times and the claim of reduced surface level traffic has been arrived at. There is a lack of transparency around the modelling inputs in terms of population growth, mode shift and containment.

**2. Insufficient Traffic:** Modelling outputs included in the State Infrastructure Strategy, 2012 suggested that 13% of traffic using the Harbour Bridge and Tunnel crossings would transfer

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<sup>1</sup> Report of Nigel Turner, Strategic Transport Planner for North Sydney Council page 7 and 10 [https://www.northsydney.nsw.gov.au/Council\\_Meetings/Meetings/Council\\_Meetings/Council\\_Reports\\_29\\_Oct\\_2018](https://www.northsydney.nsw.gov.au/Council_Meetings/Meetings/Council_Meetings/Council_Reports_29_Oct_2018)

to an “Inner West Bypass”. With 11 general traffic lanes currently available on the Harbour Bridge/Tunnel, this would mean that traffic re-assignment from these existing crossings would only constitute enough demand to fill  $\frac{3}{4}$  of a lane of traffic in each direction. <sup>2</sup>

**3. Military Rd problem not solved:** The proponent has claimed only a 10%<sup>3</sup> Reduction on Military Rd will be achieved. Transport planners have stated that this will be a short term gain due to induced demand, rat running, toll avoidance and densification. With 6 lanes of traffic on Military Road, this equates to less than  $\frac{1}{2}$  a lane of traffic in each direction re-assigning to BL from Military Road. The WHTWFU EIS did not include any data analysis of the full Military Rd Corridor so the 10% reduction claim cannot be verified. The documents and project team have confirmed that even that percentage is based on future traffic levels not today’s traffic, so the claim is unable to be verified. Based on today’s level of traffic the travel time savings quoted are not possible as the current average peak hour trip times are less than the savings claimed (See Attachment B)

**4. A Low Priority Project:** In the State Infrastructure Strategy 2012-2032, INSW stated: Infrastructure NSW concluded that Northern Beaches Link is a lower priority for Government funding support because of the lower traffic volumes, the lack of through traffic, limited population growth on the Peninsula and the limited role of Military Road in the freight distribution network.

**5. Feeding WestConnex does not validate this business case:** Dr Michelle Zeibots has concluded that the Western Harbour Tunnel and Beaches Link are required to fill mainline tunnel capacity of Westconnex stage 3 not to solve congestion issues. “In the case of WestConnex Stage 3, traffic volume estimates from the model used to produce traffic volumes for the EIS show that in the morning peak period, 10 years after opening, traffic volumes are estimated to be about one third of the motorways ceiling capacity....In light of the model results that show such low traffic volumes in WestConnex Stage 3, it is reasonable to assume that one of the key motivations for wishing to proceed with construction of the Western Harbour Tunnel and F6 motorways is to generate more traffic to fill the WestConnex tunnel.” <sup>4</sup> This is not a justification for spending \$14B+ on these projects – one toll road should not create a problem to be solved by another toll road. If a project does not benefit the transport system over all it should not be approved. Patch work solutions just lead to a transference of pinch points and are not solutions.

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<sup>2</sup> Report of Nigel Turner, Strategic Transport Planner for North Sydney Council page 8  
[https://www.northsydney.nsw.gov.au/Council\\_Meetings/Meetings/Council\\_Meetings/Council\\_Reports\\_29\\_Oct\\_2018](https://www.northsydney.nsw.gov.au/Council_Meetings/Meetings/Council_Meetings/Council_Reports_29_Oct_2018)

<sup>3</sup> Beaches Link EIS Guide  
<https://www.abc.net.au/news/2020-06-04/covid-recession-mortgage-stress-default-home-loans-jobkeeper/12318274>

<sup>4</sup> From the submission of Dr Michelle Zeibots – Research Director for UTS Transport Research Centre – into the Parliamentary Inquiry into Westconnex pages 6 and 11

The key points arising for this project from an analysis of information presented in the Environmental Impact Statement (EIS) for the WestConnex Stage 3 proposal include:

- a. The mainline tunnel at 4 lanes in each direction only attracts enough traffic to fill it to one third of its capacity during peak periods
- b. If motorway links to the northern beaches via the WHT and to the south via the F6 are added to the network, traffic volumes are estimated to rise to levels that would help justify WestConnex Stage 3, with estimates filling the mainline tunnel to about two thirds of its capacity during peak periods
- c. If the connections to the WHT proposed as part of the Rozelle Interchange were not included, impact of the construction on the local area and construction cost would be significantly reduced
- d. Not including a motorway link to the Northern Beaches via a WHT would reduce the longer-term traffic volumes in the mainline tunnel reducing the need to build the mainline tunnel at 4 lanes in each direction, where two lanes in each direction would be more than sufficient
- e. In relation to strategic need and objectives, this summary raises the possibility that a key motivation for the WHT and BLT could be to generate additional traffic to help increase volumes in the proposed WestConnex Stage 3, which will operate as a private toll road. Without the additional traffic, WestConnex Stage 3 in its current configuration will produce outcomes similar to those experienced on the Cross City Tunnel.

**6. Public Transport Alternatives not Compared or Substantially benefited:** If public transport is offered people will use it. B Line introduced November 2017. Average daily traffic on Spit Road on RMS live traffic website peaked in 2017 at 66,000 vehicles. In 2018 fell to 64,000 and in 2019 fell to 59,900. The claim of “express bus services” is misleading as there is no dedicated bus lane in the tunnel. If the buses cannot travel faster than cars then there is no incentive for people to move to public transport. A rail-based alternative would deliver far better outcome in terms of public transport uptake.

**7. Reliant on Pre-Covid Population Growth Forecasts:** The assumed growth in the traffic volumes for the tunnels are significantly above existing traffic using surface roads and current population growth level, implying that the government has assumed significant levels of development in the forecasts.<sup>5</sup> Modelling has been done based on a pre- Covid reality, post- corona virus the government is predicting a significant slow-down in our population growth with the Prime Minister stating that net overseas immigration will go from 210 700 in 2019 to 34 000 in 2021<sup>6</sup> Commentators are also documenting a population shift as people seek a tree or sea change and a permanent shift to work from home for at least a proportion of the population. We have an opportunity to decentralise Sydney, a concept that is alignment with the Greater Sydney Commissions Plan for 3 Cities. Decentralisation is the best method of managing a growing population in a peninsular city.

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<sup>5</sup> John Moratelli, ‘Beaches Link/Western Harbour Tunnel Project – Congestion Impacts and Public Transport Alternatives’, November 2018 <https://wepa.org.au/wepa-resources/wepa-submissions/>

<sup>6</sup> <https://www.theguardian.com/australia-news/2020/jul/07/coronavirus-means-australia-wont-meet-migration-forecasts-for-a-decade>

Building a radial road project does not fit with this vision of encouraging local employment. It continues to feed a centralised model for Sydney.

**8. High Cost:** The cost of the tunnel at A\$1b per km versus the cost of the metro at A\$230m per km does not stack up or represent value for money.<sup>7</sup> The total cost at EIS stage for both the Western Harbour and Beaches Link projects is \$14bn at the EIS stage the NorthConnex project was quoted at \$3bn – it's cost has doubled during the build. No comparative public transport review has been completed contrary to the projects SEARS requirements<sup>8</sup>

**9. High and underscoped risk:** The WHTWTFU and Beaches Link EIS's contains many areas of uncertainty such as "uncertain geology" and unknown levels of contamination. Significant contaminants have been found in the Harbour, along the Warringah Freeway, in Flat Rock Gully and Middle Harbour. The cost of mitigation and remediation likely to be high given the highly sensitive nature of the environments and the fact the project is located in Sydney's largest school zone and in and around contaminated areas. Test results have not been shared with the community and there are repeated calls for more testing across the EIS. There are no mitigation plans despite a moderate high risk to community and workers and no money yet set aside for remediation or rectification in the event of an accident. In addition, major infrastructure such as the very large Northside Storage Tunnel has not been assessed or even noted in the EIS– conflicts with infrastructure is likely to blow out costs and timeframes if not properly scoped.

**10. The Travel Time Savings don't add up:** The government has refused to release the business case for these projects to both the Upper House and the public. In early August 2020 some documents were provided to the Upper House but did not include the justification of travel times. Most travel time savings claimed are impossible based on the average speed of the future road and the current average travel times.

**11. A Questionable BCR:** In May 2020 Infrastructure NSW issued a summary of the Western Harbour and Beaches Link project which contained limited information. Viable Transport Solutions completed a review based on information available and have concluded that the project has a weak BCR. The BCR for the project has not been made public at any point in the process.

**12. The project does not create the jobs needed most post pandemic:** The government is claiming that the combined jobs generated from this project = 15,000. Based on other similar projects many of these will be highly specialised and in the construction industry with consultants having been previously brought in from overseas. It is unclear if we have the technical expertise in Australia to be able to service such a high-risk undertaking and whether waiting for overseas experts will create delays as it has in other projects i.e. opening of NorthConnex. Statistics as at August 2020 show that the greatest areas of need when it comes to jobs in the Inner West, North Sydney, Willoughby electorates and Beaches are not in the construction industry - so the local jobs that are most needed are not served

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<sup>7</sup> <https://www.smh.com.au/national/nsw/revealed-the-14-billion-western-harbour-tunnel-beaches-link-price-tag-20170717-gxcy6a.html>

<sup>8</sup>

by this project. Construction jobs that create more schools, medical facilities and support the IT/service industry would directly benefit jobs in the area and create long term job security.

**13. The Beaches need a solution, a public transport solution:** A mass transit solution has been recommended to government for the Beaches for close to 100 years. The Roseville Bridge Corridor is more congested and more underserved by public transport than the Spit/Military Road corridor. The City and South West Metro currently being built will carry an additional 100,000 people per hour and will run every 4 minutes during peak; and will get to Barangaroo in 9 minutes. This a comparable distance to the Chatswood to Dee Why corridor. A mass transit option along this alignment would take pressure off both Military Rd and Roseville Bridge/ Eastern Valley Way. The “Move - Northern Beaches Transport Strategy 2038”<sup>9</sup> states that the goal is to reduce car usage by 30% by 2038 on the Beaches– this project does not meet this objective and will take car usage in the opposite direction.

**14. Due process and good governance do not appear to be employed:** The Upper House has called for the business case for these projects for over a year, repeated refusals lead to a censure motion against the Leader of the Government in the Upper House. Some information was provided for upper house eyes only but the Beaches Link and Travel Time justifications were not included. Money appears to have been released from the Restart Fund prior to a business case review by Infrastructure NSW as required. In the recent budget the Generations Fund<sup>10</sup> was earmarked for future funding – it is not clear how the criteria for the use of the generations fund is met by this project ie improving the wellbeing of communities and reducing debt?

**15. More traffic for the Northern Beaches:** The EIS and the Northern Beaches Council<sup>11</sup> have confirmed that the beaches link will deliver a substantial growth in traffic to the Northern Beaches. The Frenchs Forest Area is particularly poorly impacted as is Balgowlah and Seaforth ...and local roads will also receive higher levels of pollution according to the EIS. The project goals of reducing congestion are not met, congestion is simply transferred, or in some suburbs grown, through induced demand and a lack of efficient public transport options.

**16. The Inquiry into Westconnex recommended Business Cases be released<sup>12</sup>:** prior to approval and found that greater transparency around major projects is needed.

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<sup>9</sup> <https://files.northernbeaches.nsw.gov.au/sites/default/files/documents/policies-register/transport/transport-strategy/transportstrategy.pdf> page 12 and 13

<sup>10</sup> [https://www.treasury.nsw.gov.au/sites/default/files/2019-12/NGF%20Annual%20Report\\_FINAL.pdf](https://www.treasury.nsw.gov.au/sites/default/files/2019-12/NGF%20Annual%20Report_FINAL.pdf)

<sup>11</sup> [https://www.dailytelegraph.com.au/subscribe/news/1/?sourceCode=DTWEB\\_WRE170\\_a\\_GGL&dest=https%3A%2F%2Fwww.dailytelegraph.com.au%2Fnewslocal%2Fmanly-daily%2Fbeaches-link-tunnel-submission-from-northern-beaches-council-expects-9-per-cent-car-increase%2Fnews-story%2F3c8c98ed1e49610edcbc841933b3de1b&memtype=anonymous&mode=premium](https://www.dailytelegraph.com.au/subscribe/news/1/?sourceCode=DTWEB_WRE170_a_GGL&dest=https%3A%2F%2Fwww.dailytelegraph.com.au%2Fnewslocal%2Fmanly-daily%2Fbeaches-link-tunnel-submission-from-northern-beaches-council-expects-9-per-cent-car-increase%2Fnews-story%2F3c8c98ed1e49610edcbc841933b3de1b&memtype=anonymous&mode=premium)

<sup>12</sup> <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2497#tab-reportsandgovernmentresponses>

## **Why a toll road project along this corridor is not an ethical decision:**

**1. The project is not favoured by the public:** the public has lodged thousands of objections to the project across both the design phase<sup>13</sup> and Western harbour Tunnel EIS – many of those during Covid circumstances and over the Christmas period. Over 3 thousand letters have gone into representatives of State Parliament and to the Premier objecting to the risks and the \$14+bn spend and in June 2020 an 11,000 strong petition was submitted and debated in parliament. A majority of the objection has come from the North Shore and Inner West HOWEVER these actions were taken in response to the Western Harbour Tunnel EIS being produced. A survey<sup>14</sup> by Zali Steggall showed that residents of Killarney/Forestville, Seaforth/ Balgowlah, Manly/ Fairlight and Allambie/Manly Vale all placed active and public transport needs above the tunnel and several asked for the rapid bus service from Dee Why to Chatswood as their first preference. The only area 's that put the tunnel first was marginally the Dee Why area and by a big margin the Mosman area! However this was before the EIS, now that we have seen what the project actually entails, and after the recent outrage over public transport cuts, it is clear that the Beaches want public transport. Given the timing of release of the EIS many haven't seen what the project actually means but those that have are calling out for better solutions. The government should publish an apples to apples comparison and let the public decide.

**2: A toll road is not a sustainable** mass transit option: See Climate and Sustainability Chapters.

**3: Puts homeowners under stress during a crisis:** The latest Job Keeper statistics show that the route of the combined tunnels (includes Waverton, Crows Nest, Cammeray and Brookvale) have some of the highest job keeper rates on the North Shore. With a high proportion of families and high mortgages and lower relative incomes around the expressway - building these tunnels as we recover economically post-Covid may be disastrous for hundreds of families<sup>15</sup>. Given the highly residential route and the fact that

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<sup>13</sup> <https://www.stophetunnel.org/our-open-letter-to-gladys-berejikli>

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<sup>15</sup> <https://www.abc.net.au/news/2020-06-04/covid-recession-mortgage-stress-default-home-loans-jobkeeper/12318274>

thousands of substratum acquisitions are required families may be placed in an unacceptable financial situation. Given the collapse around the Lane Cove Tunnel and media reports of issues around the Inner West buyers are understandably wary and if they have to choose between a tunnel construction zone or not will most often choose otherwise. Locking families into mortgage stress for at least 7 years of construction is unacceptable.

**4: Largest School Zone in NSW:** The projects cross under and around the largest school zones in NSW. Children commute across the project footprint daily and travel to and from sports fields. We estimate that the route of both projects will impact 26 schools of 500-1000 pupils each and many more pre-schools. The projects cumulative time scale is 8 years if risks do not blow out construction timeframes.

### **Reasons why a train/ metro line will work**

1. **Cost of metro much cheaper** than road tunnels - the cost of the tunnel at A\$1b per km versus the cost of the metro at A\$230m per km.

2. **Sydney wants public transport** - if public transport is offered people will use it. B Line introduced November 2017. Average daily traffic on Spit Road on RMS live traffic website peaked in 2017 at 66,000 vehicles. In 2018 fell to 64,000 and in 2019 has fallen to 59,900.

3. **Strategic objectives better served by public transport.** Key conclusion from Western Harbour Tunnel & Beaches Link Transport Study PREPARED FOR: North Sydney Council. *“A wider analysis of the Norther Sydney and North Beaches sectors does not point to a motorway option as being the best potential option for the region and its many communities. As with previous NSW Government Inquiries into the M1 Motorway, there is insufficient evidence to support its construction and it is important for communities and local governments to consider that while a state government and the RMS may advocate motorway construction, there are now sufficient examples in Sydney and other major cities along Australia’s East Coast to demonstrate that governments often get these things wrong. The most pressing recommendation arising from this analysis is that investigation into extending the heavy rail or metro network should be undertaken concurrently with any*

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*further investigation of any motorway development. As outlined in Section 5, the relative speed of public transport networks has a significant influence on congestion levels that can be experienced in the road network. Analysis of public transport use in Sydney's northern sector supports the case that the strategic objectives would be better served by an investment in new public transport infrastructure and network coverage improvements that would move more people more efficiently and at higher speeds across and within the region."*

**4. Population Growth** The government has stated that there is insufficient population growth on the beaches to support a rail investment however the toll road tunnels are predicated on significant population growth. A corridor assessment performed by the government confirmed that the Dee Why to Chatswood Corridor is in fact now a viable option. If development is needed to support a toll road solution, why not consider development centres around a rail corridor rather than spread development and more cars for the beaches?

## Options Analysis

2. **Dee Why to Chatswood Metro** – At A\$230m per km would cost A\$4.6b. (Ref: From the Western Harbour Tunnel & Beaches Link Transport Study PREPARED FOR: North Sydney Council)
3. **Dee Why to Chatswood Rail** - A Northern Beaches Rail Line would:<sup>16</sup>
  - a. Provide higher hourly capacity to destinations outside the northern sector than a WHT and BLT motorway option
  - b. Enhance access along an east-west alignment to key activity centres for which there appears to be higher demand
  - c. Enable activity centres at Dee Why, Brookvale and the Northern Beaches Hospital Precinct to form around points of concentrated pedestrian activity
  - d. Enable access to regional jobs centres where parking and road space has restricted viable ceiling capacities
  - e. Require less land-take than a motorway and expanded local distribution road network option
  - f. Cost less than motorway construction
  - g. Provide mobility options for people who do not drive, including an aging population
4. **Other Options – B line buses from Dee Why to Chatswood** with a dedicated bus lane. The NSW State government introduced this proposed B Line service in the most recent NSW State Budget. This has not been considered as part of the project.
5. **A Metro extension under Military Rd:** The Military Rd Metro was announced in 2016 but never proceeded – this should be reconsidered to service local commuter traffic which is a key cause of congestion around the area.

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<sup>16</sup> Western Harbour Tunnel & Beaches Link Transport Study PREPARED FOR: North Sydney Council



