

8 March 2020

The Secretary of the Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Sir/Madam,

My name is Stephen Ferris and I am a resident of 135 Bellevue Street, Cammeray, NSW. Having considered the Environmental Impact Statement (EIS) for the Western Harbour Tunnel and Warringah Freeway Upgrade (the Project) and its implications for the community, **I object strongly** to the following matters:

1. Air quality

Despite claims in the EIS that extensive modelling has been carried out on air quality impacts during both construction and operation, it is clear that the outcome is fundamentally flawed. It is simply unacceptable that unfiltered smokestacks are being proposed for the Project, particularly so close to our local schools, day-care centres and thousands of homes such as ours and **I object strongly** to the Project proceeding in its current form.

The assertions in the EIS are contrary to the latest medical research and puts our children and the elderly at an unacceptable risk. The modelling itself is flawed as it assumes that Australia has already adopted the highest international standards of vehicle emissions and fuel cleanliness (ie Euro 6 and 7) whereas this is not the case and there is no guarantee that the Federal Government will do so. Australia has an older fleet of "dirtier" cars compared with Europe and it cannot be assumed that the transition to low-emission (ie electric) vehicles will occur here in an acceptable timeframe.

Sydney's air quality has been severely and adversely impacted by the Summer bushfires and these occurrences are only becoming more frequent and more severe. When the exhaust fumes and particulates from the proposed unfiltered smokestacks are added to bushfire smoke and the existing pollution levels then the Air Quality Index (AQI) will be raised to dangerous levels on a regular basis which is simply unacceptable.

If this Project is to go ahead, **I demand the following conditions for approval:**

- a. Redesign of the Project with exhaust and fresh-air stacks no more than 4-5 kms apart (eg the Stockholm E4 Bypass Tunnel); and
- b. All tunnels and the Warringah Freeway to be closed to all traffic on days when the AQI reaches dangerous levels (ie 200 or more).

2. Business Case and Public Transport Alternatives

The final cost of the whole Project is unknown as the NSW Government refuses to publish the business case.

Despite claims in the EIS that other forms of public transport were considered, this is clearly not the case. All the alternatives considered in the EIS focus on road solutions, which only add to traffic and pollution issues, when many rail (light and heavy) solutions yield superior outcomes as evidenced in overseas jurisdictions.

As a business professional, **I object strongly** to the Project proceeding in its current form.

If this Project is to go ahead, **I demand that:**

- a. The NSW Government publish the full business case before any approval is given; and
- b. Transport for NSW prove that the Project is the best solution taking into account all other forms of public transport and particularly rail. As part of this, the light rail link between Chatswood and the Northern Beaches should specifically be re-assessed.

3. Noise and Vibration

The Project involves 6 years of major construction works and noise levels throughout the day from machinery, a fleet of trucks and increased volume of traffic in the North Sydney area will be intolerable, despite the use of acoustic sheds on some parts of the Project. As someone who works as a professional in the North Sydney CBD, **I object strongly** to the Project proceeding in its current form.

The EIS itself admits that excessive noise will impact more than 5,000 residents and envisages that the normal working day for the Project will extend to 10pm on an unspecified number of days. The EIS refers to “out-of-hours work” that implies actual construction work could extend to 24 hours a day for 365 days a year which means excessive noise levels could be experienced all the time for up to 6 years which is unacceptable.

Vibration levels are also predicted to be above acceptable levels up to 300 metres from the construction work which could possibly cause damage to property and have a detrimental impact on human wellbeing.

If this Project is to go ahead, **I demand the following conditions for approval:**

- a. A strict 6pm curfew on noisy activities on weekdays, 1pm on Saturdays and no noisy work on Sundays; and
- b. Strict rules to be imposed and mandatory consultation on any out-of-hours work.

4. Traffic

The Project in its current form will have many adverse traffic impacts both during construction and operation, including:

- a. Parts of the Warringah Freeway will be closed for several hours each day (possibly for 24 hours a day for certain events) for enlargement and tunnel-building.
- b. Demolition and rebuilding of various bridges over the Warringah Freeway will cause chaos.
- c. The EIS ignores the effect on traffic flows of the B1 bus link to the Northern Beaches, the proposed B2 bus link between Dee Why and Chatswood, and the North-West Metro.
- d. The EIS grossly overstates the time saving the new tunnels will provide and ignores the impact on commuters to and from the CBD, North Sydney and Chatswood. Military Road, Miller Street and other local main roads will most likely be more, not less, congested in rush hours.
- e. Re-routing of traffic lanes on the Warringah Freeway means that it will be difficult for many drivers on the Lower North Shore to reach their preferred Harbour crossing, leading to the use of "rat runs" through residential areas to reach the desired entry point.
- f. The EIS itself predicts that certain areas and roads in the North Sydney region (North Sydney, Cammeray, North Cremorne and Neutral Bay) will suffer "moderate" to "high" impact during the years of construction and/or thereafter during operation.

As someone who lives in Cammeray, works in North Sydney and regularly commutes to the CBD and Chatswood, **I object strongly** to the Project proceeding in its current form.

If this Project is to go ahead, **I demand the following conditions for approval:**

- a. Re-assessment of the effect on recent traffic flows of point c above; and
- b. A better solution be found to avoid rat runs created by re-routing of traffic lanes on the Warringah Freeway.

5. Green/Open Spaces

There are numerous examples in the EIS of loss of critical green/open spaces in the North Sydney/Cammeray area, including:

- a. Loss of the underground reservoir beneath the Cammeray Golf Club (CGC), which is a major irrigation source for open spaces in the area, due to the proposed major building works for an exhaust pumping station which will take 3 hectares (one third) of the CGC.
- b. Land will be taken from St Leonards Park which will significantly reduce local open space.
- c. Part of the south-east corner of Anzac Park will be taken permanently for the realignment of Cammeray Avenue due to the widening of the Warringah Freeway.

As someone who lives in Cammeray, regularly plays on and walks through the CGC and enjoys the existing green/open spaces of the area, **I object strongly** to the Project proceeding in its current form.

If this Project is to go ahead, **I demand the following conditions for approval:**

- a. A solution be found that retains the invaluable environmental resource that is the underground reservoir beneath the CGC; and
- b. The exhaust pumping station be put underground to preserve green spaces; and
- c. At least an equal area of green space be created locally for all public open space taken by the Project.

6. Other

- a. Explosives for rock-blasting will probably be stored in the CGC work site. **I demand** reassurance on the safety of local residents, road users and users of the CGC such as myself.
- b. The proposed dredging of Middle Harbour and Sydney Harbour poses contamination risks which are unacceptable. **I demand that** these aspects of the Project be reconsidered.
- c. The Project is not on the High Priority or Priority project lists for NSW (despite the EIS profiling that it is on the Infrastructure Australia priority list). **I demand that** the Project be reconsidered in light of the circa 20 other projects that rank ahead of it in our home State.
- d. Tolls on the existing harbour crossings are likely to rise dramatically and be charged in both directions to match those imposed on the Western Harbour Tunnel and to raise revenue to help pay for the Project. **I object strongly** to this.
- e. The publication of the EIS for the Northern Beaches Link (NBL) has been delayed at least 6 months beyond that of the Project. **I demand that** approval for the Project be delayed until there is time for proper consideration of the whole project, including the NBL.

I look forward to your response to the points raised in my submission at your earliest convenience.

Yours sincerely

Stephen Ferris