

## Western Harbour Tunnel and Warringah Freeway Upgrade – Submission March 2020

I strongly object to this project proceeding at all and advocate its abandonment or at the very least a significant delay until all of the matters raised herein are satisfied and the EIS is rewritten and exhibited again. My reasons are provided below:

### **1. The Project has no economic benefit. (It is not listed in any of the seven annual reports of Infrastructure NSW.)**

Infrastructure NSW is the independent statutory body established by the NSW government in 2011 (Infrastructure NSW Act 2011). It delivered its first report for the year to 30 June 2012 to Mr Barry O'Farrell, then Premier of NSW on 26 October 2012.

At the time it was established, the Premier said:

*“Infrastructure NSW was an innovative, ground-breaking new body to sharpen NSW's competitive edge to achieve economic growth through strategic infrastructure investment.”*

The Chairman and CEO's Report says:

*“Our primary task has been to prepare a State Infrastructure Strategy, which assesses the current state of infrastructure in NSW and the needs and strategic priorities for the next 20 years. Our Strategy is independent advice to the NSW Government on the infrastructure projects and reforms that we believe will make the biggest difference to driving productivity and economic growth.”*

The Year in Review section of the report covers all of its activities. In the year ended 2012 the report listed the following:

- a. 20-year State Infrastructure Strategy;
- b. Port Botany – Sydney Airport Precinct (*West Connex*);
- c. Major Projects Assurance Framework;
- d. Restart NSW;
- e. Better Value Infrastructure Plan and
- f. Sydney International Convention, Exhibition and Entertainment Precinct

Projects were listed and prioritised in what appears to be descending order of importance measured by economic benefit. The \$10 billion West Connex project rates as number 1 on the list. The Western Harbour Tunnel and Beaches Link project as it was then known didn't get a mention.

In arriving at its recommendations, Infrastructure NSW developed a Major Projects Assurance Framework which it used to independently review and evaluate major infrastructure projects with a capital investment value of more than \$100 million, with the aim of helping the Government ensure infrastructure projects are:

- a. The highest priority and scoped for maximum value for money;
- b. Delivered in a timely and efficient way; and
- c. Managed and maintained efficiently over their life.

All of the above and the rest of the report reveals that government wants to ensure that taxpayers' money is properly directed to projects that deliver economic benefit.

Infrastructure NSW's last report is for the year ended 30 June 2019. Apart from some additional tasks allocated by government, the thrust of the work has been to ensure that projects are selected on economic merit. In that regard, there are several major projects that are reported on in detail and yet the WHT & BL project is not mentioned. This suggests that despite its large cost (not disclosed but rumoured to be in the vicinity of \$15 billion) it is a project of low economic benefit and not worthy of promoting, or:

It has not been promoted to Infrastructure NSW for its independent review.

## **2. There is not yet a Business Case to support the Project.**

The EIS provides no cost for this section of the overall project comprising a road transport link from Rozelle to the Northern Beaches or even for the current EIS which excludes the Beaches Link.

Enquiries sent to RMS received this response: *"A summary of the final business case will be prepared and released by Infrastructure NSW, the NSW Government's independent infrastructure advisory agency, once an investment decision has been made."*

This is very confusing:

- a. given that Infrastructure NSW has not mentioned the project in its most recent annual report and
- b. the preparation and release of a business case summary will be done after an investment decision is made. This suggests that either the business case is irrelevant, and/or the business case will remain secret from the community so that it will not be allowed to comment on this most important aspect of the project. It suggests a strong likelihood that the project will deliver no material cost benefit at all.

## **3. The project was suddenly promoted as government policy during the by-election campaign in 2017 occasioned by the early retirement of the sitting MP for The North Shore.**

- a. Up until that time the project was nothing more than another RMS proposal that was being lobbied by vested interests to avoid long delays on the Spit Bridge for residents living in the Northern Beaches area. That is how it was promoted when announced enthusiastically by the Premier and the Liberal candidate in the by-election. No mention was made of an independent evaluation by Infrastructure NSW. All of the benefits were limited to travel times that might be saved.

- b. The project had not been developed beyond early concept stage and there had been no evaluation in accordance with government policy as written into the Infrastructure NSW Act and as conveyed in the first annual report of Infrastructure NSW.
- c. The reality is that the WHT & BL project will do very little to ameliorate traffic congestion on the Spit Bridge and Military Road as most traffic is local. Traffic to/from the Northern Beaches has the alternative route via Roseville.
- d. In other words, the decision to advance the WHT&BL was political and certainly not made on the basis of economic benefit supported either by Infrastructure NSW, or by other independent advice, otherwise it would have been promoted as such.
- e. RMS has been hurrying since that 2017 announcement to develop the plan to such an extent that it will be “shovel ready” as promoted by the newly elected local member for North Shore. The work to date as evidenced in the EIS and the early commencement date is much more than necessary to evaluate the proposal for a business case review which should have accompanied or been included in the EIS for the community to provide comment.
- f. It is staggering that a project of such magnitude would be progressed to the EIS stage without first undergoing a proper business case analysis. If that analysis has been done and the result not revealed to the public for whatever reason, then it is a moral disgrace.
- g. The government is a servant to the people they govern, not their master. Secrecy destroys democracy.

#### **4. The Western Harbour Tunnel & Warringah Freeway Upgrade Project Has Many Negative Impacts on the North Sydney CBD.**

- a. The Greater Sydney Commission Northern District Plan predicts an additional 822,496 sqm of commercial office space in North Sydney over the period to 2036. This will result in jobs increase of 21,100. These figures ignore the impact of an additional 3,000 dwellings (~5,000 persons) in the five years to 2021 for the whole of the North Sydney LGA and similar increases over each of the five years to 2036. The plan also predicts 196,000 population growth in the North Sydney Municipality.
- b. North Sydney is home to the highest number of schools in any LGA in NSW with more than 10,000 students attending private schools and the Catholic University in close proximity to the CBD many using public transport. Demand on the public domain is already significant, emphasising the need for safe and attractive pedestrian connections through the CBD to the adjoining suburbs.

- c. The influx of this additional population and students together with significant increases in vehicular traffic will have dramatic negative impacts on the existing limited public space in North Sydney.
- d. The Project fails to address at all the already urgent need for improved pedestrian accessibility in the public domain in North Sydney nor for the future increases in population.

**5. The Project Completely Ignores the Exhibited Documents in Appendix V discussing Urban Design, Landscape Character and Visual Impacts that are to drive the Urban Design Outcomes for Road and State Government Projects in General.**

- a. The exhibited documents are *“Beyond the Pavement”* by Transport for NSW and *“Better Placed”* by the NSW Government Architect. There are many important statements in the *‘Beyond the Pavement’* document that this project completely ignores, such as in the Urban Design Policy Chapter:

- *‘Projects should be sensitive to existing built, natural and community environments in which they are situated. They should contribute to the future character, functioning and convenience of adjacent areas, provide an interesting experience in movement and should be safe for all users and the community. The architectural and landscape quality of road should be visually pleasing’*
- *‘Urban Design must be integrated into the process of developing, delivering and managing the road’*
- *‘Projects must contribute to the quality of urban design, life of communities and contribute to the sense of place’*

- b. In Chapter 1.3 on Physical design outcomes the document states that:

- *‘road transport infrastructure must fit sensitively with and that roads, bridges, bicycle and pedestrian paths should be designed as part of public domain’*
- *‘The infrastructure planning and design must contribute to the accessibility and connectivity of communities and a general permeability of movement through areas by all modes of movement, including walking and cycling’*

- c. The community wants to transform North Sydney CBD from a business centre challenging pedestrian environment which has been for many years affected by the Warringah Freeway and Pacific Highway slicing it into isolated islands, into an attractive centre with high quality public domain and safe pedestrian and cyclist connections. The centre with a sense of place and a distinct character, fine streets and public spaces and safe and attractive links to the adjoining suburbs.
- d. It is very disappointing that this project does not address and care about the future needs of the residents, workers and daily users of the North Sydney CBD.

This proposal will significantly exacerbate the negative impacts of vehicular through traffic on the already depleted public domain and the current and future demand for high volume pedestrian movement in North Sydney.

**6. The major shortcomings of the project impacting the North Sydney business district are:**

**Traffic Impacts.**

The project directs major traffic flows into North Sydney and onto Berry Street. Majority of traffic intersections in North Sydney CBD will be affected in a negative way and they will be much worse and will fail.

In Chapter 9, Operational Traffic and Transport it is stated that in 'do something combined scenario' that many intersections in North Sydney would experience significant delays and in fact the table 9-8 demonstrates that majority of them will experience major congestions and will fail. This is an unacceptable proposition to the residents of North Sydney.

Huge amount of public funds is allocated for this project and the negative impacts on the North Sydney residents have been completely ignored.

North Sydney will become collateral damage in this ambitious, rushed and poorly conceived state government project. Below, is the summary of the bad impacts of the high volumes of traffic affecting some streets in the North Sydney CBD and the adjoining areas. Note that none achieve A level (Best) service and all are E or F (FAIL).

- Falcon Street and Warringah Freeway PM - FAIL
- Falcon Street and Merill Street PM - FAIL
- Berry Street and Walker Street PM - FAIL
- Berry Street and Miller Street – E (just short of FAIL)
- Mount Street and Arthur Street PM – FAIL
- Mount Street and Walker Street PM - FAIL
- Pacific Highway and Walker/ Blue Streets -E (just short of FAIL)
- Pacific Highway and Miller Street – E (just short of FAIL)
- Pacific Highway and Miller/ Berry Street – E (just short of FAIL)
- Pacific Highway and Berry Street - FAIL
- Pacific Highway and Bay Road - FAIL
- Miller Street and McLaren Street – E (just short of FAIL)
- Miller Street and Ridge Street – E (just short of Fail)

The entry from Falcon Street to the tunnel should be considered as an alternative to Berry Street to reduce the impact of the through traffic on the North Sydney CBD and in particular on Berry Street - the levelled street with best sun access in winter and shelter from cold winds for outdoor dining.

Converting Berry Street to a major four lane highway when North Sydney Council wishes to improve pedestrian amenity by reducing it to two lanes, shows contempt

for those documents mentioned in Section 5, that are supposed to drive the planning outcomes.

### **Pedestrian Amenity and Connectivity**

There are very few pedestrian connections offered across the Warringah Freeway to North Sydney CBD from Neutral Bay and from Kirribilli.

The proposal replicates what is currently existing without analysing what may be needed in the future and how to encourage people to walk and cycle more through safe and attractive shared bridges and safe road crossings across confusing multi directional road lanes.

The State Government should invest into the quality of public domain and accessibility into the North Sydney CBD to cater for the large increase of worker population.

**It is very disappointing that such a high-level state government project does not offer anything positive to the community that will be the most affected.**

Major pedestrian crossings in the CBD are at fail level for pedestrians, they are at Pacific Highway with Miller Street, Walker Street and Berry Street. The additional crossings needing improvements are at Berry and Walker and Miller Streets and Mount and Walker Street.

The North Sydney Council is trying to make Miller Street between Berry and Pacific Highway a pedestrian plaza. This needs to be factored in when considering the excessive flow of through traffic into the North Sydney CBD.

North Sydney CBD needs to be a winner from the outcomes of this not welcomed project in terms of the improved connectivity over the dreaded Warringah Freeway that slices the municipality into two, creates an impenetrable barrier for pedestrians and cyclists and it is a major scar on the urban landscape of this city.

The current EIS drawings show only a very limited improvements of pedestrian links, they look very rushed and developed as an afterthought, with no safe pedestrian crossings to these bridges and connections across major intersections to the local streets on either side of the freeway. There is a hideous long ramp proposed at Ridge Street with no stairs allowing able people to make a quicker access.

The High Street pedestrian connection is in particular unsafe and it does not improve the current situation at all. The additional negative impact from the B-Line buses accessing Blue Street at this intersection will contribute further to the chaos and conflict.

Many of these rushed afterthoughts have not considered safety of access to these limited links across traffic lanes.

The project needs to offer more shared bridges across the Freeway, the edges of the new construction along the freeway need to be well landscaped and the interfaces of the freeway with local streets well considered by the urban designers, possibility of some quality open space or a park should be explored by RMS landscape team along the edge of the CBD.

The possibility of a major park over the freeway along the edge of the CBD should be investigated and included in this project to soften the impact of the additional traffic and to cater for the future recreation needs of a much larger population now and for future generations. This vision has been raised many times previously, yet it is a major exclusion from the current EIS. Why?

The Chapter 9 in 9.1.1 is stating that North Sydney Integrated Transport Program is established working with North Sydney Council on promoting walking, cycling and public transport. There is currently no evidence of such collaboration in the exhibited documents. The statement above appears to be an afterthought with no intent.

The most disappointing statement in the EIS is that the tunnel works are considered to be most equitable outcomes from the perspective of maintaining a balanced and integrated transport network through North Sydney.

Major design changes and improvements are needed to this project including full collaboration with North Sydney Council to achieve better public domain outcomes for North Sydney. These outcomes include but are not limited to:

- No harbour tunnel access from Berry Street
- New public square by partial closure of Miller Street
- Improved pedestrian environment in Pacific Highway and all city streets
- Better pedestrian connectivity across Warringah Freeway
- Major city park over Warringah Freeway

**In conclusion, the project should either be abandoned or completely revisited to provide certainty of economic benefit (business case) and to also address the many shortcomings and negative impacts on the North Sydney CBD.**

Wollstonecraft 2065 resident (address withheld)