Submission relating to the Western Harbour Tunnel EIS

1 Introduction

I have read the community consultation document (Chapter 7) and have many comments on it. However I advise here that everyone with whom I have discussed the project in North Sydney is opposed to the project, and would much prefer to see improvement to the public transport system, and maybe some improvement to Warringah Freeway, but without new tunnels.

I consequently object to the entire project, and strongly recommend that adequate community consultation is undertaken and alternative options reviewed in detail before proceeding.

I can see that some residents of the Inner West may welcome the project as it will make access to North Sydney easier for them (maybe requiring bus routes to develop since parking in North Sydney is limited). However, based on the meetings in Balmain, the majority of local residents there also oppose the project – see https://www.jamieparker.org/whteis_slides

While I object to the whole project, I have focused on impacts of the completed project, not on impacts during construction. Others closer to the construction sites, including schools, will be better placed to comment on construction issues.

The EIS does not as far as I can see include an estimate of project costs. However, North Sydney Council has estimated it at over $20 billion.

I object strongly to the misuse of government funds and my tax to fund a project that is almost irrelevant to the needs of North Sydney. Other options, for example in relation to mass public transport would be far more beneficial and less costly.

2 Chapter 0 – Executive summary

While the Summary does list project objectives and benefits (Figure E-3) it does not include a clear problem definition and analysis. In particular, why the WHT/BL will reduce traffic on the Harbour Bridge and current tunnel.

I object to the lack of adequate problem definition or analysis, both in the summary and elsewhere in the EIS (at least that I have been able to locate).

Alternatives Considered

Para 3 states that "Following identification of a new motorway tunnel as the preferred strategic alternative"

I object to this statement. It does not draw on analysis in any of the project documents I have reviewed, and in particular does not compare the motorway option to public transport – rail/metro in particular.

Cities around the globe are focussed on public transit as a major transformation of cities from car dominated places to sustainable liveable and productive places. The fact that public transport patronage in Sydney has reached levels forecast to be achieved in 2031, by 2020 highlights the importance of public transport options which avoid increased levels of traffic in the North Sydney CBD.

As Ministers Constance and Pavey note in the "Ministers' Message" in the "Future Transport Strategy 2056":

"By 2056, …Sydney, will become a global city similar in size to London or New York…This growth will mean our networks will need to handle 28 million trips a day and double the current metropolitan freight loads. **These challenges and opportunities highlight the importance of our choices today and call for bold, new ideas that ensure the productivity, liveability and sustainability of our communities.**

The Future Transport Strategy 2056 Strategy also notes:
"Liveable communities promote social inclusion and the health and wellbeing of the people who live in them. Transport is vital to mobility as a 'placemaker'." (Page 6)
The current proposal does not address options which potentially improve the health and wellbeing of the North Sydney community by delivering a more pedestrian focussed place.

There is no serious discussion of rail options anywhere in the documents that I have so far seen, and it is recommended that the project planners undertake a detailed assessment of rail options and demand over the next 30 years, before the current proposal is accepted. It is agreed that the Beaches Link proposal is better suited to a full metro alternative than the WHT, but rail options need to be assessed for both WHT and BL before accepting either tunnel proposal.

Strategic Alternatives

Says that it covers "Improvements to alternative transport modes"

I object to the fact that the summary makes no further mention of this.

Traffic and transport impacts during operation

"During operation of the project, potential localised negative impacts include:
• Localised delays in North Sydney and surrounds, resulting from increased traffic demands and changes to road network operations."

Table 9-8 looks at junction delays at peak hour, but nowhere that I can see is the overall impact on North Sydney traffic assessed. This is a serious omission.

I object to the absence of adequate assessment of the impact on North Sydney traffic, which will be almost entirely negative.

The project will clearly benefit those people seeking to travel from North Sydney to the inner west, but these will be few (maybe very few) in number. I have lived in North Sydney for over 40 years and can only recall making the trip to meet a friend in Lewisham about 4 times. For most North Sydney residents most of the time, the WHT (and NBL) will provide no benefits.

I object to the absence of any demand survey for the residents of North Sydney, who this project will most adversely affect.

More information is said to be in Chapter 9 (see below).

The project is said to reduce noise impact for 57% of "receivers" (p20). If the volume of traffic using North Sydney streets increases due to the project, it is hard to see how we will experience less noise than at present.

I object to the poor analysis of sound impact on North Sydney residential and commercial streets.

Air quality impacts during operation

"However, the project would result in a better outcome for ambient air quality than conditions without the project."

This is very doubtful, since the tunnels will concentrate emissions. However, since it is likely that many vehicles will be electric by say 2035 with zero local emissions, impact will be reduced.

I object to the unfiltered emissions stacks which will adversely affect schools and residents in the areas around the stacks, and the lack of adequate air cleaning in the tunnels which will be dangerous for people in the vehicles using the tunnels as long as most vehicles are petrol or diesel.

I object to the long distance between the stacks of around 6.5 km which is far longer than all overseas tunnels that I have read about. Far more analysis of the distance between stacks is essential. It is noted that a mid-tunnel stack in the middle of the harbour would be very risky to boats.

Social and economic impacts

"Infrastructure for NSW has estimated that the economic risk to growth and productivity posed by traffic congestion in the Eastern City District is about $5 billion a year, and is forecast to increase to about $8 billion annually by 2020." (p21)

What has Eastern City District got to do with the WHT? I have searched the Infrastructure NSW website but can find no reference to this statement. Perhaps you mean Harbour City which North Sydney is part of according to the Greater Sydney Commission. The EIS should be modified to reflect this.

I agree that increasing traffic density has economic costs. All new roads tend to generate additional traffic density so options including rail need to be looked at in depth. The impact of self-driving, self-spacing and electric cars on traffic flows etc needs to be assessed – these are not mentioned as far as I can see in the EIS.

I object to the use of the Eastern City District data and the lack of any serious estimate for the economic cost to North Sydney. Also the lack of assessment of ANY potential expansion of public transport systems apart from the B-Line buses, which will negatively affect North Sydney in relation to traffic (though benefiting Northern Beaches residents).

I particularly object to the plan for B-line buses to travel to North Sydney station in Blue St which threatens pedestrian amenity and will worsen traffic jams in Miller St.

3 Chapter 3 - Strategic context and project need

Section 3.5 Key benefits of the Western Harbour Tunnel

3.5.2 Faster, more reliable journeys on Sydney Harbour crossings, states that "Journeys from North Sydney to Kingsford Smith Airport would experience time savings of about 15 minutes".

This refers to morning peak hour, when we seldom travel to the airport. I would anyway not expect savings greater than 5 or 10 minutes due to the WHT. Actually, from where we live, if the Pacific Highway and Berry Street are more congested due to the WHT/NBL then there may be no or negligible time savings. We travel from North Sydney to the airport several times each year and have

never experienced any particularly slow bridge crossings or on the Eastern Distributor (M1). The only particular problem we have experienced is in Airport Drive on which the WHT will have no impact on as far as I know.

I object to the estimates of time savings to the airport, which focus on peak hours and do not provide any estimate of savings at other times.

Figure 3-11 Change in the percentage of jobs accessible within 30 minutes in the AM peak as a result of the project by 2037

What is meant by "percentage of jobs"? Percentage of what – without explanation, this makes no sense (at least to me). More explanation is needed.

I object to the lack of explanation of the percentage of jobs estimate

4 Chapter 4 - Project development and alternatives

On page 1 the Secretary's requirement is that "the EIS must include, but not necessarily be limited to, the following:

e. an analysis of any feasible alternatives to the project"

There is brief mention of "***Improvements to the rail network"*** on page 11. However it is totally inadequate with NO information on how improvements to the rail network could improve links between the northern beaches and western Sydney. Certainly the Northern Beaches link is most relevant in this regard, as rail from eg, North Sydney to western Sydney is already adequate but peak hour capacity might need to increase in the absence of WHT.

However, in my view, the EIS totally fails to meet the secretary's requirement listed above. The Metro West is (just) mentioned in a couple of places in the EIS (eg, on p26 of Appendix F) but no analysis of its impact is mentioned.

I object to: the total lack of analysis of feasible alternatives to the project.

On page 4-13, the EIS states that "the project would improve active transport links through the provision of a new dedicated bicycle path along the eastern side of the Warringah Freeway between Miller Street at Cammeray and Ernest Street, as well as a number of new and upgraded shared user bridges which would provide connectivity across the Warringah Freeway."

Cycling

I have been cycling in North Sydney almost every day when in Australia since moving here in 1978, but don't use the routes discussed above. The increase in traffic in North Sydney as a result of the project will be strongly negative on both classes of road user.

Appendix F does mention "Provision of new or upgraded pedestrian and cycle infrastructure" on page xvii, but does not provide details apart from "enhancing pedestrian and cyclist safety, accessibility and connectivity, including new shared user paths, replacement of the narrow Ridge Street bridge, a new active transport bridge near Ernest Street and dedicated cycleways."

I object to the lack of analysis of the impact of the project on both cyclists and pedestrians, and the inclusion of few positive components for either. I require that the EIS examines in detail the impact of the project (as hopefully redesigned if not cancelled) on cyclists and pedestrians throughout

North Sydney and includes more components that benefit both classes of user. I would ask that a summary of all proposed cycleways is included in the final version of the EIS.

Alternatives

Also on page 4-13 the EIS says "When considering the strategic alternatives and complementary projects discussed in previous sections, it was concluded that the construction and operation of a new tunnelled motorway crossing of Sydney Harbour (the project) was the preferred solution."

IMO there is almost NO discussion of alternatives.

I object to the very limited, actually almost non-existent, analysis of alternatives such as mass public transport. I recommend that the project is not approved until adequate analysis has been completed, with the tunnels proven to be optimal from financial, economic, social and environmental viewpoints.

5 Chapter 7 - Stakeholder and community engagement

The following table takes some points from **Table 7-7 Summary of stakeholder and community feedback** (p 7-19).

Feedback topic	2017	2018	Total	
Air quality impacts, location and operation of tunnel ventilation system, potential impact on health [the largest response]	1068	4729	5797	100%
Satisfaction with engagement	151	86	237	4%
Support for project	89	184	273	5%
Dissatisfaction with engagement process, need for further project detail, consideration of different ways to engage with the community and stakeholders including different mediums	81	232	313	5%
Oppose project	59	2243	2302	40%

Notable are that only 4% of the maximum response number expressed satisfaction, 5% supported the project and 40% opposed. This means that 8 times as many people opposed the project as supported it. Other reports indicate a higher negative response, though the 99% opposition quoted in my comments on Appendix E may be an over-estimate. However, in my experience and that of the North Sydney precincts[1], there is not a single person who has spoken in support of the project.

I object to the decision to attempt to proceed with a project which is so strongly opposed by the community is it intended to serve, and recommend that a detailed survey is conducted before approving the EIS. The survey should include at least 10% of randomly selected householders in all of the suburbs directly affected by the projects. They would need to be provided with sufficient information to be able to make informed decisions.

---

1 If you are not familiar with North Sydney's precinct system, it is discussed at https://www.northsydney.nsw.gov.au/Council_Meetings/Community_Engagement/Precincts

A petition opposing the tunnel with 10,100 or so signatures opposing the tunnel was assembled in North Sydney in May 2019. This was presented to the NSW Government which refused to accept.

Key points included:

- Stop the Western Harbour Tunnel and Northern Beaches Link project and undertake meaningful and rigorous community consultation;
- Release to the public the business case for the Western Harbour Tunnel and Northern Beaches Link projects;

I object strongly to the refusal of the NSW Government to accept a petition signed by over 10,000 residents in May 2019 and the failure of the EIS to report this. I require that the petition is accepted by both the government and Transport for NSW, and its recommendations fully analysed and if relevant, accepted.

NSC's Sustainable Transport Reference Group passed a motion on 13 May 2019, recommending:
"That North Sydney Council write to the Premier congratulating her on her government's decision to fast track the Sydney West Metro and expressing the hope that this marks the start of a policy to prioritise sustainable public transport projects over unsustainable motorways. In particular, a commitment to scrap plans for the Western Harbour Tunnel and Beaches Link and instead build a rail tunnel to the Northern Beaches servicing the North Sydney Council LGA and the City."

North Sydney's Combined Precinct Committee

At its meeting on 18 February 2020 passed a motion stating that: **"CPC requests that Council promote the view that there should be a mass public transport system researched in detail as an alternative to the WHT and related Beaches Link proposal."**

This was passed by 14 of the 15 precincts present, with one abstention.

I object strongly to the refusal of TfNSW to recognise at all the extremely strong objection to both WHT and the Beaches Link and require detailed analysis of this before the project goes any further.

6 Chapter 9 - Operational traffic and transport

Secretary's requirements
"The Proponent must assess and model the operational transport impacts of the project including, but not necessarily limited to:
a. forecast travel demand and traffic volumes (expressed in terms of total numbers and heavy and light vehicle numbers) for the project and the surrounding road, cycle and public transport network, including potential shifts of traffic movements on alternate routes outside the proposal area "

Table 9-4 indicates predicts traffic demand for the WHT at 87,000 per day in 2027 and 106,500 in 2037 on the assumption that the Northern Beaches tunnel is built. If not, the volumes would be around 20,000 per day less. IMO the table is totally inadequate since it gives no sources for the estimates. Did the planners for example undertake origin and destination surveys of road users on the roads currently connecting the start and end of the link? If not, why not? If so, where are the analyses?

In my view, the estimates are going to prove to be EXTREMELY over-estimated. The number of vehicles seeking to travel from North Sydney to Annandale and the west are likely to be at least 50% less than the estimates, probably making the road uneconomic.

It is further noted that by eg, the mid 2030s, the majority of cars will be electric and self-spacing. This will at least double the capacity of all trunk roads, and increase the capacity of existing bridges and tunnels, probably making the WHT unnecessary. However, it would reduce the negative environmental impacts of the stacks.

It is noted that the transport planners in Sydney have often over-estimated the future usage of new tunnels. This has resulted in the bankruptcy of the tunnel operators for the Lane Cove and Cross City tunnels.

In this chapter, I would have expected to see estimates of the growth of vehicle numbers over 10 years (for example), operational costs and the vehicle fees required for break-even and for normal profit. There is no mention of this here (or elsewhere in the documents as far as I can see).

Induced Traffic
While questioning the traffic estimates for 2027 and 2037 above, it is certain that new roads such as WHT induce or generate traffic. Thus if there is a quick way to get to North Sydney from Rozelle, more people living in Rozelle may be interested in applying for jobs in North Sydney since their travel time would be lower than using pre-existing transport systems. However, parking for their vehicles in North Sydney (or Crows Nest/Lane Cove/Chatswood) will be a major issue, and may negatively impact local residents.

I object to: an apparent extreme overestimate of the vehicle usage of the WHT, and the lack of analysis of the impact of electric and self-spacing cars on traffic demands and capacities on existing roads.

I also object to the apparent absence of any detailed origin and destination surveys of vehicles currently eg, using the Anzac Bridge. Those with origin to the north of the Harbour Bridge and destinations such as Rozelle (and others) would likely use the WHT.

7 Chapter 20 - Land use and property

Warringah Freeway and surrounds

The Cammeray Golf Course will lose 4.83 ha of land during construction and 2.5 ha permanently. North Sydney is already one of the suburbs with the least amount of green space per person in Sydney. We have 557 residents per hectare of green space or 2.5 times that of the next most dense suburb (Willoughby).

I object to the taking of any (net) area of green space, and recommend that the project takes steps to mitigate (and even improve) this. For Cammeray Golf Course, the sheds should be placed underground and covered by park. Similarly a new land bridge should be constructed to join Cammeray Golf Course with Anzac Park on the other side of the freeway and allocated as public park.

8 Chapter 27 - Cumulative impacts

I would have expected some analysis of traffic flow impact on North Sydney in this chapter – there is nothing that I can see. It talks about construction and significant impacts during the construction period, but nothing about post-completion impacts.

On p 24 it states “The cumulative assessments are discussed in detail in their assessment chapters and technical working papers listed below, and are therefore not considered further in this chapter.”

Traffic and transport: Chapter 9 (Operational traffic and transport) is discussed above and Appendix F (Technical working paper: Traffic and transport) discussed below.

The increase in traffic passing through or stopping in North Sydney, though likely lower than predicted by the EIS, will have an extreme impact on North Sydney residents, causing pollution, congesting streets and increasing noise and dust. Others have mentioned the classification of junction delays in North Sydney with many junctions in the CBD classed as F (failing) during peak hours, but I have so far been unable to find it.

It is noted that existing bridge, tunnel and freeways have already had an extreme negative impact on North Sydney. The new proposed tunnels and widening of Warringah Freeway will further increase the negative impact to a significant degree.

I object to: the lack of analysis of the negative impacts of the project on the residents of North Sydney.

9 Chapter 28 - Synthesis of the environmental impact

It is almost unbelievable that this chapter makes NO mention of the impact of the WHT and NBL on North Sydney's traffic. Our view is that it will increase local traffic greatly. No North Sydney resident that we have met supports the proposal.

I object to: the limited assessment of the impact of the project on North Sydney's traffic and thus its environment.

Section 1.1 states that "The Sydney Harbour Bridge, Warringah Freeway and Eastern Distributor have been identified as three of Australia's 30 most congested road corridors, generating a congestion cost of $65,000 per day in 2016 (Infrastructure Australia, 2019)." However a search of The Australian Infrastructure Audit 2019 - Supplementary report does not identify this. The reference needs to be more precise. It is not clear what the $65,000/day refers to. Presumably just the three roads identified in total?

I object to the lack of a reference list at the end of each chapter or appendix.

10 Appendix C - Environmental risk analysis

Summary from **Table 5 Environmental risk analysis** on page 4. My comment is in the right-hand column.

Potential impact	Residual risk	Comment/Objection
• Improved travel times and accessibility to and from the Lower North Shore, particularly between North Sydney and Rozelle • Road network performance improvements • Improved road safety • Provision of new and improved public and active transport links • Improved connectivity • Urban amenity improvements.	Positive impact	Littler benefit to North Sydney Impacts are ALL negative for almost all North Sydney residents

Potential impact	Residual risk	Comment/Objection
• Reduced road traffic noise as a result of traffic moving off surface roads into the tunnels.	Positive impact	Negative for many North Sydney residents
• Road traffic noise impacts.	Low	At least medium for North Sydney residents who will be affected by significant increases in traffic volumes after completion. Large impacts for many during construction.
• In tunnel air quality impacts to human health • Impacts to ambient air quality due to increased traffic and emissions from tunnel ventilation facilities	Low	Medium Medium dependent on your location
• Property acquisition • Creation of residual and surplus lands	Medium	High in some areas
• Reduced congestion and travel times.	Positive impact	Strongly negative for many North Sydney residents
• Road based spoil haulage management (traffic and noise impacts).	Low	Very high for some residents, for example those living on Bay Rd

Table 5 mentions "Construction impacts on cyclists and pedestrian routes." This is the only mention of the impact on cyclists and pedestrians". The project will have many negatives for both (though some positives if improved cycle paths are constructed).

I object to the seeming lack of assessment of the environmental impacts on cyclists and pedestrians.

Today I drove along Pacific Highway and turned right into Berry St, following two large Mack trucks with trailers, presumably carrying spoil. Each truck took almost a full light change to make the turn (ie, truck only for the first truck, truck plus only me for the second truck).

I object to the transport of excavation material by road through North Sydney and Cammeray, also probably in Birchgrove.

Many locals are now using the Coal Loader for social activities. We play boules at the Coal Loader every Thursday (when fine) and lunch at the Coal Loader café on Friday. If construction workers are allowed to park on Balls Head Drive, it will make use of the Coal Loader if visiting by car impossible.

I request that the construction company is made to ban any parking on public roads by cars or trucks. They must be required to ensure that the Berrys Bay carpark is large enough for all project and workmen's vehicles (see Figure 5-12 in Appendix F).

I object to the project on the grounds that its environmental impacts are entirely negative for North Sydney and also for the Harbour, which will be severely negatively impacted by the excavation of highly polluted tunnel material.

I object to the disastrous use of Berrys Bay during construction, which will affect us as frequent users of the area when we visit Balls Head or the Coal Loader, but will be disastrous for local residents for the entire construction period.

11 Appendix E - Community consultation framework

The number and range of proposed consultation mechanisms and targets is impressive, though the actual consultation program is not known. However https://www.stopthetunnel.org/ states that:

“In total over 7000 individual pieces of feedback from the community were received by the RMS. Community members could write in separately and/or place a comment pin on one or both of the RMS feedback maps below. In total 3443 comments were made and 99% of the comments were negative or outright objections…. In addition to feedback to the RMS; two petitions were run , groups made submissions and individual letters were sent to the Premier and other decision makers. There was an overwhelmingly negative response to the projects across the tunnel route.”

I object to the limited consultation process undertaken and the seeming total failure to address the main conclusions of the consultation process, opposing the construction of the tunnels.

I mentioned the failure of the government to accept the 10,100 signature petition in 2019 in Chapter 7 above.

I object to the refusal of the government to accept and act on this petition and request that it is now accepted and responded to.

12 Appendix F Traffic and transport (part 1)

Table 7-1 Models ‘Do something’ morning peak hour traffic demands at key locations (SMPM Sydney Motorway Planning Model)

And subsequent tables talk about modelled traffic demands but neither the appendixes nor Chapter 9 give any indication of how the models were designed. They simply say that they use the The Sydney Strategic Travel Model and the Sydney Motorway Planning Model (SMPM), developed and operated by Transport for NSW, with no indication of the inputs and outputs adopted. However, the sources and types of data used are listed in Table 25.

Table 7-1 indicates peak hour (2-way do-something) flow in the WHT of 5300 vehicles per hour in 2027 and 7200 per hour in 2037. It is hard to see how this would reach the budgeted daily flow of 87,000 per day in 2027 and 106,500 in 2037. My guess is that daily flow would be a maximum of around 8 times peak hour flow, suggesting 42,000 per day in 2027 and 60,000 per day in 2037.

I object to the traffic flow estimates. RMS will have accurate peak to daily multipliers for eg, the Harbour Bridge and can verify or modify the EIS flow estimates.

Page 241 of Appendix F of the EIS states that:

"There would be no access from the Berry Street northbound on ramp to the Falcon Street eastbound off ramp (in addition to the Falcon Street westbound off ramp identified above), or to the Warringah Freeway mainline. Connections to Western Harbour Tunnel, Beaches Link, and the Miller Street and Brook Street off ramps would only be provided from the Berry Street northbound on ramp. Traffic would be required to travel via the North Sydney road network to access the new High Street northbound on ramp, Falcon Street eastbound, or the Warringah Freeway via the Falcon Street interchange"

We travel from Bay Rd x Pacific Highway to the Lane Cove tunnel (or parallel road) frequently to visit relatives. We would normally access the tunnel from Berry St. This means that after WHT

construction we would have to go down to the proposed new High St access to the Warringah Expressway, adding more than a kilometre to the trip and involving possible traffic delays.

I object to: the limiting of access to the Warringah Freeway from Berry St, and recommend that access to lanes leading to the Lane Cove tunnel is permitted. Otherwise it will create more local congestion on roads already congested at peak hour.

I object to the cutting of North Sydney's business district in half by the widening of Berry St to four lanes, and its use as access to the WHT. I also object to the loss of parking on Berry St. I recommend that an alternative way of accessing the WHT if built is found.

Tolls
We are advised that the Sydney Harbour Bridge (and Tunnel) will have northbound tolls imposed in order to make the WHT more competitive.

I object to northbound bridge tolls and strongly oppose the imposition of additional tolls on the Harbour Bridge and Harbour Tunnel. It is also possible that tolls will be imposed on the Warringah Freeway, and I (of course) strongly object to that. Tolls should never increase at more than the inflation rate, and the 4% increase planned for Westconnex should not be applied to the Bridge.

13 Appendix G Noise

Appendix G covers noise. Part 1 is 206 MB and Part 2 194 MB in size. These are ridiculous file sizes, and can reduce to 105 and 134 MB respectively – still large. I looked at Berry St in Part 2 on page 582 (out of 2500) since it is likely to be significantly affected by increased traffic and thus noise. There are about 250 entries for 77 Berry St with impact >2dB almost only on the thirtieth floor and higher. The lowest floor assessed is the 6th. I note that every floor of 80 and 88 Berry are noise affected

Several other Berry St properties are assessed between Pacific Highway and Edward which is and will be low in traffic density. The last Berry St property is on p859.

I object to the presentation of the data in Appendix G with Berry St spread over almost 300 pages, the waste of space covering 3 to 29 Berry St, and the size of the files. I also object to the inadequate analysis of noise impacts, which will be significant in streets where traffic volume increases and delays are common, as in Berry St. Many people now live in apartments in centre of North Sydney.

14 Financial and Economic Performance

I am unable to find any reference to the likely financial and economic performance of the project. Given the dismal financial failures of the Lane Cove and Cross City tunnels in 2010 and 2005/13 due to wildly optimistic traffic forecasts, for WHT (and Beaches Link (BL)), it would be expected that financial performance estimates would be essential. This would need to include estimates of the likely use of the tunnel and the access cost.

Nowhere that I can see in the EIS documents are there any origin and destination surveys of road users currently using the Harbour Bridge and Tunnel. This would seem to me an almost essential part of any study.

In terms of economic performance, the tunnel option needs to be compared to the upgrading of rail and other public transport services.

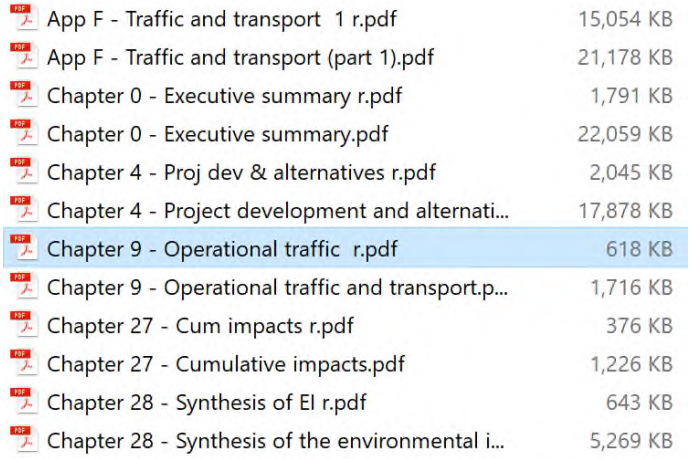
I do understand that economic analysis is not required under our environmental impact legislation, but it must be a key determinant of whether the project should proceed. I am consequently disappointed that there is apparently no link to any such analysis, assuming it has been completed.

I object to the non-disclosure (or non-computation) of the expected financial and economic performance of the WHT, and recommend that it is released before the EIS is revised.

15 File Size

The WHT EIS is a large and complex document. Its files are extremely large, which needs to be corrected by the site managers. The files I have downloaded so far are shown below.

The files with a small r at the end of their name have been reduced in size in Acrobat using (Alt FHR), and remain readable in Acrobat 6 and more recent versions. Only App F did not reduce greatly in size, with for example Chapter 0 reducing from 22 MB to 1.8 MB. I recommended to RMS that all files on the site should reduced in size to save downloading effort and disc use by those accessing the EIS. My reduced files sometimes have shortened names, as I need to keep them to less than 48 characters to be readable in my Explorer windows. My suggestion was rejected.



While I am critical of file size (and thus the file saving option adopted), the authors should be commended for ensuring that the bookmarks are well organized.

In my view, the large file sizes, with others I have recently downloaded being around 200 MB, limit the wish of community members to download files and strongly reduce the value of the EIS to community members.

I consequently object strongly to the failure of the report authors to reduce file sizes, which serves as a disincentive to people affected by the tunnel to download the files. I recommended by email on 11 February 2020 that RMS/TFN reduced file sizes in Acrobat (Alt FHR) for this project. This was rejected by the Department.

16 Recommendations

I recommend that:

1. The EIS needs to be reviewed in detail and updated to reflect the importance of public transport as part of all major transport infrastructure investment in NSW and the response to criticisms in this note and criticisms by others.
2. The EIS documentation is so extensive, exceeding 9000 pages, that even the extension of time to 30 March is inadequate. I recommend that the EIS submission period is extended to 12 May as requested by North Sydney Council.
3. Public transport options must be addresses as part of this proposal - Rail/metro/bus development options need to be considered as a serious alternative to the road tunnels program. The EIS should not be completed or the project approved until detailed assessment of public transport alternatives has been completed. It is noted that almost all European cities have been focussing on strengthening their public transport networks rather than major roadworks. That is what most of us need in North Sydney.

4. Future trends in vehicle operation, car ownership levels and the shift to automated vehicles need to be reviewed in detail. This includes the expected move towards electric cars and self-driving cars. These will allow a substantial increase in traffic density on existing roads and may even remove most or all of the benefits of new tunnel construction.
5. Both North Sydney and Inner West councils strongly oppose this project. The NSW government should accept this criticism and cancel the Western Harbour Tunnel construction. Some aspects of the Warringah Freeway upgrade could perhaps still be considered.
6. It is noted that the $17 billion Westconnex project has been a disaster for many if not most of the residents of the inner western Sydney suburbs, particularly St Peters. It also had a substantial cost blowout and delay in opening. The government was unable to publish estimates of the anticipated traffic volumes. WHT MUST avoid falling into all three of the major Westconnex problem areas. It is noted that the Sydney city council strongly opposed Westconnex. Their attitude to WHT needs to be defined.