

Belinda Scott  
Senior Planning Officer  
Transport Assessments  
Department of Planning, Industry and Environment

Hi Belinda

Thank you for talking to me today.

I enclose my latest email to Tim Kwok.

I have brought to the attention of Tim Kwok for some time that there are major two errors that I have discovered, and would not necessarily be picked up by the Public.

1. Total trips refers to vehicle numbers and not passengers. (See 4-4).
2. 'Figure 3-4 Forecast change in weekday traffic volumes average (two-way) in the AM peak on key Northern Beaches corridors by 2037'.

' The Correct label should read: *Figure 3-4 Forecast change in ~~average~~ weekday traffic volumes ~~average~~ (two-way, ~~daily~~) ~~in the AM peak~~ on key Northern Beaches corridors by 2037*' according to Tim Kwok.

I received Tim Kwok's final reply on 26 February 2021 (see Item 5) below.

I also include it here.

Please confirm receipt of this email

Thank you.

Regards

David Altman

( Final Email from Tim Kwok of 26 Feb 2021, at 12:02 pm)

'Hi David,

We understand your concerns, however as advised in my previous email on 24 February, we are not in a position to amend EIS. The Department of Planning, Industry and Environment will assess the EIS, the Submissions Report and the correction of errors and discrepancies therein. The Department will publish the Submissions Report on the major projects website. We will also advise our email subscribers once DPIE have released the Submission Report

The Beaches Link and Gore Hill Freeway Connection Environmental Impact Statement (EIS) was on display from 9 December 2020 to 1 March 2021. The exhibition period of 61 days\* is in line with the EIS exhibition period for both the WestConnex M4-M5 Link and Western Harbour Tunnel and Warringah Freeway Upgrade projects. \*NOTE: The period from 20 December 2020 to 10 January 2021 (inclusive) is not included in the 61 days.

The EIS exhibition and submissions process is handled by the DPIE. If you have any feedback in regards to the EIS submissions process or exhibition timeframe, please contact them on [majorprojectssupport@planning.nsw.gov.au](mailto:majorprojectssupport@planning.nsw.gov.au).

After the submissions deadline, we will be working on the Submissions Report which will be publicly available on the Department of Planning, Industry and Environment (DPIE) Major Projects portal once completed in the coming months.

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As a way of a reminder, and as mentioned previously as I hope you can appreciate our team is very busy responding to the large volume of enquiries from stakeholders across the entire project ahead of the submissions closing date of midnight on Monday 1 March . As a result, it is unlikely we will be able to respond to any new enquiries ahead of the submission deadline at midnight 1 March.

Again I encourage to submit any ongoing concerns as part of the formal submissions process.

Regards,

Tim Kwok

**Western Harbour Tunnel & Beaches Link**

Greater Sydney

Transport for NSW

T 1800 931 189

[nswroads.work/whtbl](https://nswroads.work/whtbl)

My Latest email to Tim Kwok:

28 February 2021 10.50 am

URGENT

Tim Kwok,

Head of Western Harbour Tunnel & Beaches Link Greater Sydney, Transport  
for NSW Roads and Maritime WHTBL

Re: Northern Beaches Link potential project .  
Incorrect totals and labelling.

**ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 5.17 (2)**

Hi Tim

Further to the Email from **Tim Kwok**, Head of Western Harbour Tunnel & Beaches Link Greater Sydney, Transport for NSW Roads and Maritime WHTBL of 26 February 2021 12.02 pm and my brief response of 26 February 1.47pm, (see below ), as time is of essence, I want to communicate to you that I am of the understanding that you are able to facilitate as the Proponent or inform the Proponent that a change in the EIS is necessary and extension of the exhibition period allowed or re-notification to meet obligations under the Act, in respect to the Public's interests.

As I understand you have had sufficient time, as these errors have been notified to you for some time and still have the ability as the Proponent or on behalf of the Proponent for the application (SSI-8862), in relation to 'State Significant Infrastructure' to apply to the Secretary of the Department of Planning and the Environment, under Section 5.17 (2) , (Environmental assessment and public consultation) for the Secretary of the Department of Planning and the Environment to order a revised Environmental Impact Statement for the project to address matters reported to you. (See extract from the ACT below)

The errors which have occurred are 'major' because they portray the traffic situation to be far worse than it is and therefore may distort the Public's perception of the situation and sway the Public to consider that a tunnel project is desirable. There has to be accurate information.

The following demonstrates the meaning of the term 'trip' in other parts of the EIS document: (see sources printed below)

1. Section 3.2 of Chapter 3 where **Figure 3-4** is referred to we can see reference to '**The performance of the road crossings of Sydney Harbour and Middle Harbour are critical to the performance of the arterial network servicing the Northern Beaches (refer to Figure 3-4) – particularly for north-south trips**'.

2. If we look at Appendix F, Transport for NSW Beaches Link and Gore Hill Freeway Connection Technical working paper: Traffic and transport December 2020

'Glossary of terms and acronyms' ..and look at the definitions we see in reference to '**AM' peak hour**, it is stated '**this refers to vehicle trips arriving at their destination**'. This definition is not referring to passengers. The interpretation as vehicles is further confirmed by Tim Kwok's correction of Figure 3-4 title to ...'**The Correct label should read: *Figure 3-4 Forecast change in average weekday traffic volumes-average (two-way, daily) in the AM peak on key Northern Beaches corridors by 2037***' from the original title: '**Figure 3-4 Forecast change in weekday traffic volumes average (two-way) in the AM peak on key Northern Beaches corridors by 2037**'.

If we look at figures of Figure 3-4 the numbers shown refer to vehicle trips and not passengers numbers.

3. In 'Section 4.3 Strategic Alternatives' of Chapter 4, the sentence '*The project aims to provide additional transport capacity across Middle Harbour to improve journey times and journey time reliability for trips between the Northern Beaches and key economic and employment centres. Further information on the strategic context for the project, and the transport needs addressed, is provided in Chapter 3 (Strategic context and project need)...*' is not referring to passengers but the logistics of vehicular traffic trip flow. Figure 4-4 in the same Chapter 4, flows on from this introduction.

Figure 4-4 is a stand alone figure with no specific reference to it in Chapter 4. Therefore it is logically deducted that the totals '**Average weekday trips via**

**key transport corridors'** in Figure 4-4 refers to vehicles and not passengers. For the Public as reader of the EIS, 'trips' are as referred to and defined as in other parts of the EIS.

Once again, I stress that that errors are significant and need to be amended to communicate accurate statistics of reality.

Time is of essence and immediate action is necessary to extend the Exhibition period and amend the errors, in my view.

Otherwise a new exhibition period would be necessary to communicate to the Public the correct information.

Yours sincerely

David Altman

(Item 1) Extract from the ACT

## **ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979 - SECT 5.17**

### **Environmental assessment and public consultation**

#### **5.17 Environmental assessment and public consultation**

(cf previous s 115Z)

(1) The proponent is to submit to the [Planning Secretary](#) the [environmental](#) impact statement required under this Subdivision for approval to carry out the [State significant infrastructure](#).

(2) The [Planning Secretary](#) may require the proponent to submit a revised [environmental](#) impact statement to address the matters notified to the proponent.

(5) The [Planning Secretary](#) is to provide copies of submissions received by the [Planning Secretary](#) or a report of the issues raised in those submissions to--

(a) the proponent, and

(b) if the [State significant infrastructure](#) will require an [environment](#) protection licence under Chapter 3 of the *Protection of the Environment Operations Act 1997* --the Public Service agency responsible to the Minister for the [Environment](#), and

(c) any other [public authority](#) the [Planning Secretary](#) considers appropriate.

(6) The [Planning Secretary](#) may require the proponent to submit to the [Planning Secretary](#)--

(a) a response to the issues raised in those submissions, and

(b) a preferred infrastructure report that outlines any proposed changes to the [State significant infrastructure](#) to minimise its [environmental](#) impact or to deal with any other issue raised during the assessment of the application concerned.

(7) If the [Planning Secretary](#) considers that significant changes are proposed to the nature of the [State significant infrastructure](#), the [Planning Secretary](#) may make the preferred infrastructure report available to the public.

**Planning Secretary"** means the Secretary of the [Department](#) of Planning and [Environment](#).

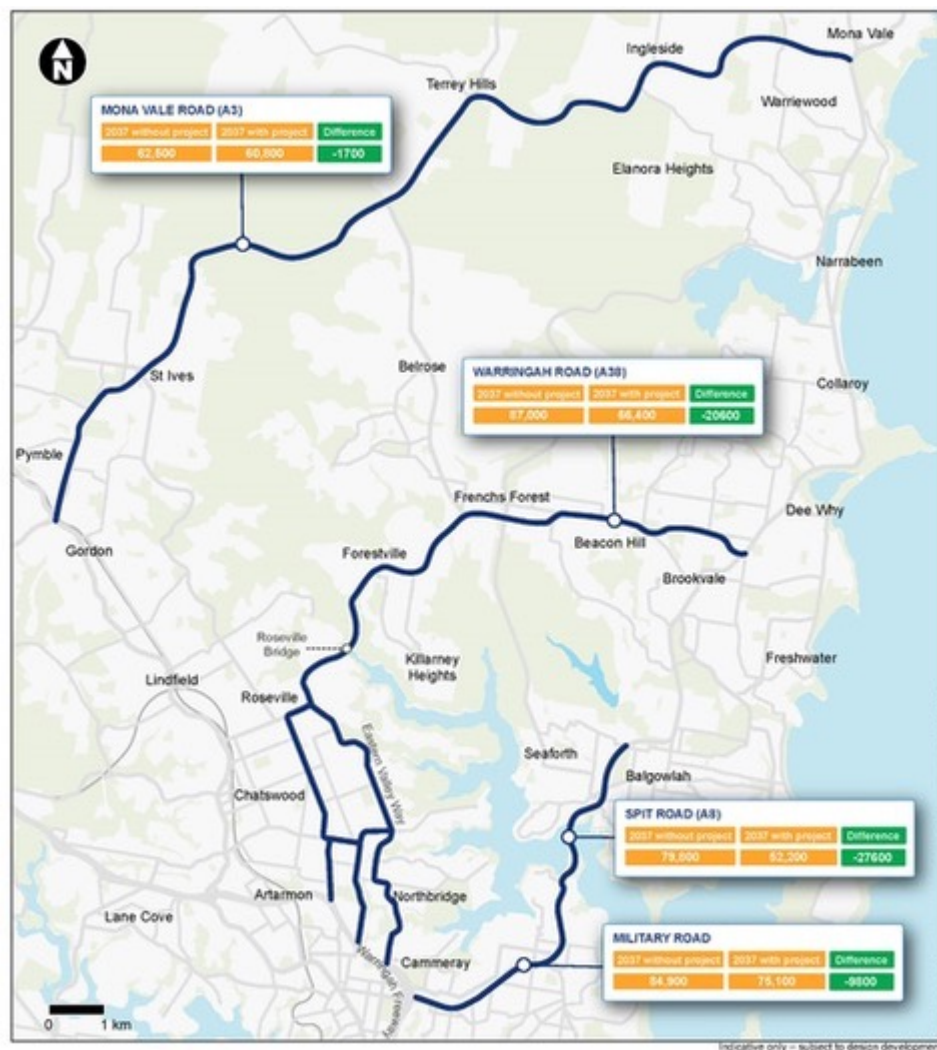
(Item 2) Extract from EIS Chapter 3.

## **3.2 The North District's road transport challenge**

Freight services, public transport and other road users travelling to and from the Northern Beaches region currently experience some of the slowest and most unreliable journey times across Greater Sydney. The transport challenges for the North District and Northern Beaches region are the product of a number of key issues, summarised below:

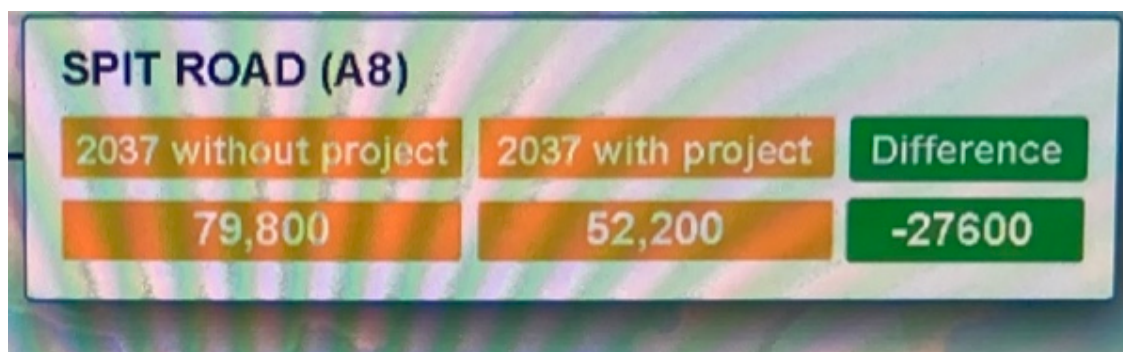
- *High traffic volumes and limited capacity at the eastern Sydney Harbour and Middle Harbour crossings, and roads around the Harbour CBD*
  - - Network data demonstrates that incidents on the Sydney Harbour crossings and their approaches heavily impact journey times for freight, buses and private vehicles travelling on the arterial network across the Northern Beaches region
  - - The limited alternative routes and high demand for the eastern Sydney Harbour and Middle Harbour crossings result in high levels of congestion, and make these cross-harbour corridors critical to the performance of the broader motorway and arterial road network
  - - The **performance** of the road crossings of Sydney Harbour and Middle Harbour are critical to the performance of the arterial network servicing the Northern Beaches (refer to Figure 3-4) – particularly for **north-south trips**
  - - It has long been understood that the benefits of upgrading road capacity to the Northern Beaches region would not be realised without addressing downstream capacity constraints at the Sydney Harbour crossings and beyond.





**Figure 3-4 Forecast change in weekday traffic volumes average (two-way) in the AM peak on key Northern Beaches corridors by 2037**

e.g Blowup from Figure 3-4 for Spit Road:



**(Item 3) Extract from 'APPENDIX F of EIS:  
Transport for NSW**

**Beaches Link and Gore Hill Freeway Connection Technical  
working paper: Traffic and transport December 2020**

Glossary of terms and acronyms

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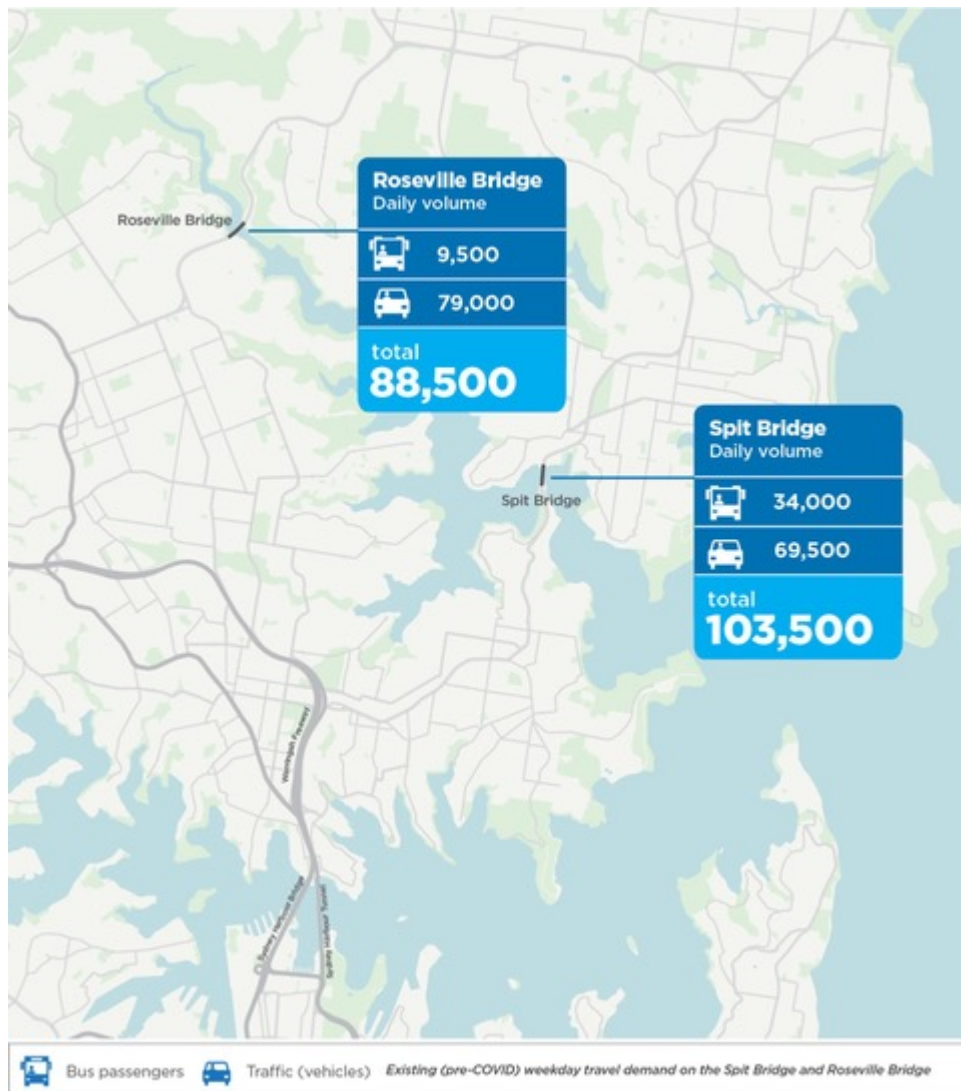
<b>AM peak hour</b>	Unless otherwise stated, <b>this refers to vehicle trips arriving at their destination</b> during the average peak hour in the morning peak period between 7am and 9am on a normal working weekday
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**(Item 4): Extract from Chapter 4 of the EIS:**

**‘4.3 Strategic alternatives**

The project aims to provide additional transport capacity across Middle Harbour **to improve journey times and journey time reliability for trips** between the Northern Beaches and key economic and employment centres. Further information on the strategic context for the project, and the transport needs addressed, is provided in Chapter 3 (Strategic context and project need).'





'Figure 4-4 Average weekday **trips** via key transport corridors (existing conditions)'

(Item 5): Email from **Tim Kwok**, Head of Western Harbour Tunnel & Beaches Link Greater Sydney, Transport for NSW Roads and Maritime WHTBL of 26 February 2021 12.02 pm and my response of 26 February 1.47pm:

26 February 2021 1.47pm

URGENT

Tim Kwok,

Head of Western Harbour Tunnel & Beaches Link Greater  
Sydney, Transport for NSW Roads and Maritime WHTBL

Copy sent to:

Gladys Berejiklian

Member for Willoughby

NSW Premier

Re: Northern Beaches Link potential project .

Incorrect totals and labelling.

Hi Tim

I refer to your response below.

I do not agree that you are not in a position to amend the EIS nor  
to extend or re-notify the whole report.

Anything is possible in my view to achieve an accurate  
communication to the Public, on two major errors which  
are likely to be read in the flow of studying the report.

Yours sincerely

David Altman

On 26 Feb 2021, at 12:02 pm, whtbl <[whtbl@rms.nsw.gov.au](mailto:whtbl@rms.nsw.gov.au)> wrote:

Hi David,

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Regards,

Tim Kwok

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