Submission to Western Harbour Tunnel and Warringah Freeway Upgrade EIS 30th March 2020

Attention: Director, Transport Assessments
Planning & Assessment, Department of Planning
Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

30th March 2020

Objection: Western Harbour Tunnel and Warringah Freeway Upgrade - SSI-8863

Anna Bragg

President P&C

Cammeray Public School P&C

[redacted]

Background

Statement of Position

"Following extensive review of the Western Harbour and Warringah Freeway Upgrade EIS, Cammeray Public School P&C **formally objects to the project as presented**. The basis of our objection, in summary, is the clear risk to children's/ resident's health and safety, the use of incomplete or inaccurate data, the lack of business case and that no comparative analysis has been done with regard to public transport alternatives. The documentation makes it clear that impacts during construction from dust, diesel fumes, truck movements and noise (especially at night-time) place children's health at unreasonable risk and that these risks cannot be satisfactorily mitigated. Possible impacts on large numbers of residential properties will cause our families undue stress and the placement of major construction sites next to our key green spaces will inhibit our children's access to sport. Long term, the EIS demonstrates that traffic and pollution in and around the school, our playing fields and homes will increase. The project has poor sustainability and climate outcomes, which contradicts what our children are learning at school, and there is insufficient evidence presented to show a positive cost/benefit overall.

The EIS represents schools across the area as only having 100 children (Cammeray has 900), it assumes better vehicle standards than are legislated and basis it's traffic modelling on 2016 and older data sets all of which make conclusions unreliable and the probable outcomes worse than documented. Cammeray Public School is part of a wider precinct of schools which is the largest in Australia and whose children have a right to live healthy lives, travelling to and attending school in safety. It is evident from the EIS that the cumulative risk to thousands of children far out way any supposed benefit to motorists. We object to the road tunnel project presented in the EIS and call on the government to provide the business case and a feasibility study into alternative public transport options.

During this time of extreme stress for our school and its' families we would like it noted that we along with 4 other schools and 15 community groups requested a suspension of the project in light of the COVID-19 crisis. We have cancelled P&C meetings, community meetings and all of our school community has been busy rearranging life and work to follow government directives and keep their families safe – we have not had time to fully engage with a 9000+ page overly complex technical document. Reading an EIS full of risk that so heavily impacts the 26 school communities and many more pre- schools along the route has added to the stress and several parents have been very distressed. We call on the government to re-exhibit the EIS after the COVID-19 crisis and fairly consult. We also call on the government to delay the exhibition of the Beaches Link (which will also impact CPS) to a time when jobs and schooling can again be secured. This is no ordinary tunnelling project – it is essentially a proposal to rebuild the Warringah Freeway to fit in two tunnels. Many of our schools were in place before the Freeway was built and many schools have been built here since. The government has an obligation to ensure the thousands of children living, traveling and going to school in the largest schooling precinct in Australia can do so in safety.

Health and Safety Objections

Our objections with regard to Health and Safety concerns are as follows:

During Construction

1. **Dust:** These risks have been assessed as high in the EIS for CPS, it's families and parks. Dust is known to negatively impact children's health and of particular concern is dust from the Cammeray Golf Course Site and along the Warringah Freeway may be contaminated. The EIS admits that dust risks cannot be fully controlled. Our school, homes and sports field at Cammeray Park will be impacted limiting our children's ability to play sport during the 5-6 years of construction works. Schools have been estimated at only 100 students which vastly under weights the sensitive receivers in the area as schools range from 500-1000 generally in size.
2. **Contamination:** Has been identified as High Risk at the Freeway sites and at the Rosalind St site. Contaminants can run into ground water and into parks as well as be trucked through our streets on tyres etc. Contaminants identified include Heavy Metals which are extremely detrimental to children's health. The route of trucks is not defined.
3. **Volume of Trucks on the Street:** Over the whole project there will be 6000+ construction movements per day needed. Most will operate between North Sydney and Willoughby where there will be 3045 vehicle movements at Cammeray Golf Course and 12 support sites. There is a large schedule of dangerous goods to be transported. This is an immense health and safety risk in residential areas full of children. Our children and families cross the busy roads of Brook St, Miller St and Amherst St to get to school and their safety must be considered. Many parents drop off, park and catch public transport into the city. This will become more difficult due competition with worker parking and the removal of 150 parking spaces across the North Shore. The area has already experienced a fatality with one construction vehicle. An illustration of sites, truck locations and location of schools is attached in Appendix A.
4. **Noise:** The EIS demonstrates that noise will considerably impact Cammeray Public school and it's surrounds throughout the 5-6years of the project. Our school is located at (31.2) but our catchment covers (28.1, 29.1, 30.3. 31.3, 31.1, 31.2, 31.3, 32.1, 30.2) and we use Bicentennial Reserve, Green Park and Cammeray Oval/ Tennis Courts and Golf Course for sport. The noise tables are complex and cumulative noise from different activities isn't shown. During stages 1, 2, 8 of the Golf Course Works sound levels will be >75 dB making coaching impossible. During the Miller St to Willoughby Rd surface works out of hours noise exceedances will impact our catchment during 16 stages/ coinciding locations. Noise will impact our children's health and learning outcomes.
5. **Mental Health and Wellbeing:** The cumulative impacts and risks of living in a construction zone is substantial for the 900+ primary school students who attend the school and their families. We are a densely populated residential and school zone and the mental health of our families is a major concern due to the scale and duration of works particularly if the project is due to start n the back of COVID-19.

Health and Safety Objections Con't

After Opening

Pollution: (Here for a summary table of pollution impacts): The ventilation stack servicing the 6.5km stack at Cammeray will not be filtered. The EIS demonstrates concerning impacts in terms of pollution for CPS and its' catchment. All areas will see overall PM2.5 levels well about national criteria when project opens. CPS will experience increases in pollution across NO2, PM10 (annual) and PM2.5 (which WHO states no safe limit). Concerningly our local parks will also be impacted by increased pollution including Green Park, Cammeray Oval, St Leonard's Park and Bicentennial Reserve. Children are most susceptible, particularly at higher respiration rates. The stacks have no emergency ventilation outlets and so fumes from any high pollution events or emergencies will be dispersed over schools in the area. A summary of the CR sites that show an increase in pollution across both projects is attached. Air pollution has been averaged out across a wide span of CR sites which appear unrelated to the Western Harbour Tunnel. As no traffic analysis has been done on Willoughby Rd for example it is hard to claim Roseville is impacted. FOR WHT only relevant sites should be included in the analysis and results should be weighted by number of sensitive receivers. One graph has results covered by the key and the PM2.5 tables do not show the correct criteria level with criterion to be lowered by 2025. Appendx B. Increased rat running due to ramp and accessibility changes will also re-distribute pollution to residential areas increasing the burden on sensitive receivers.

Substratum Acquisition: the land under houses will be acquired approx. 50mtrs either side of tunnelling, ventilation shafts and other underground works. The EIS does not make clear where the substratum will occur and there is no compensation.

Operational Noise: our noise levels are set to increase after the project opens (a testament to increased local traffic) many buildings are eligible for noise attenuation however this needs to be made a condition of approval. Cammeray PS is eligible for noise attenuation as it will be noise impacted (as will most local schools)

Visual Amenity: the stack can be seen from a long distance – maps can be found in the guidance document. Most of Cammeray will be able to see the stack once built. This degrades our visual amenity and may affect house prices creating financial stress.

Mental Health – Traffic, Loss of Green Space and other Impacts. The changes to on and off ramps, increased bus travel times from Amherst St, intersection failures, loss of visual amenity, reduced park lands and stress regarding additional pollution levels all degrades our community's mental health. This is of particular concern following COVD-19 as the project is due to start at the end of 2020 when families will still be recovering lives and livelihoods from the crisis

Traffic and Congestion

Our objections with regard to Traffic and Congestion are as follows:

During Construction

1. **Volume of Trucks on the Street:** The bulk of vehicle movements will occur between North Sydney and Willoughby where there will be 3045 vehicle movements daily at the main Cammeray Golf Course and 12 support sites – with over 2000 close to or in Cammeray schools' catchment. This is an immense health and safety risk in residential areas full of children. Our children and families cross the busy roads of Brook St, Miller St and Amherst St to get to school and their safety must be considered. Many parents drop off, park and catch public transport into the city. This will become more difficult due competition with worker parking and the removal of 150 parking spaces across the North Shore and does not support the governments objectives of supporting a mode shift to public transport.
2. **Intersection Delays:** The EIS identifies six intersections within the school's catchment that will be delayed during construction including Willoughby Road/Gore Hill Freeway interchange (morning and evening peak), Brook Street/Warringah Freeway off ramp (morning peak), Amherst Street/West Street (evening peak), Amherst Street/Miller Street (evening peak), Miller Street/Warringah Freeway off ramp (morning peak) , Miller Street/Falcon Street (morning peak)
3. **Closure of Warringah Freeway/ and onramps** The EIS states that this will be needed at times. Traffic is already backed up around the school in the mornings and this will create even more issues.

Once Open (Operational)

1. **Trip times**: Travel to and from Cammeray to nearby destinations Crows Nest, North Sydney and beyond will become extremely difficult and much slower than we are currently used to.The data used to model traffic is from 2016 which is now very out of date esp. given the B-Line and new North West Metro has come online since that time. Limited trip times have been modelled but of those that have It is clear from the EIS that through traffic is being prioritised over local traffic. The data shows that the AM Peak Delay at Amherst/Miller and Amherst/ West will increase considerably in the AM with a delay of +30sec and >95 sec respectively this will have the effect of slowing trips.
2. **Bus Times:** Many trip times have not been modelled in the EIS including the impact on the Naremburn Bus to and from the school which brings children across busy intersections from the West of our catchment. Several others that have been modelled get slower: *"Travel times on bus routes through North Sydney from Pacific Highway would increase during the busiest peak periods. This is due to the increase in demand and congestion between Berry Street and Miller Street as a result of redirecting traffic from Miller Street (resulting from the removal of the existing right turn from Miller Street northbound to Berry Street eastbound)"* Parents working in North Sydney will need to leave earlier. Afternoon peak service would increase from 11 minutes to 23 minutes, potentially forcing routes onto Miller St.

Traffic and Congestion con't

Once Open (Operational) con't

4. **Intersection Delays:** There are increased intersection delays across the area i.e. Intersection of Amherst & West St goes from an A to an F and the delay in the morning peak goes from 5 seconds to > 100 seconds. This will negatively affect parents coming to drop kids off at school. **92.5%** of North Shore intersections during the AM Peak will fail or get significantly worse (10), worse (15) or will remain the same (8) as compared to today by 2037 if the Western Harbour Tunnel is built. **92.5%** of North Shore intersections during the PM peak will fail or get significantly worse (25), worse (4) or will remain the same (8) as compared to today by 2037 if the Western Harbour Tunnel is built.
5. **A higher proportion of Trucks**: The EIS states that: *"Peak period heavy vehicle demands across Sydney Harbour would increase by up to 15 per cent; Daily heavy vehicle demands across Sydney Harbour would increase by 10 per cent*" More trucks bring more diesel pollution which will be discharged through the unfiltered stacks (Diesel is a Class 1 Carcinogen). The school will also experience a higher dose of pollution from local traffic due to the changes to access on the Freeway. The EIS states that there would be considerable time savings for truck times "providing a route that has been specifically designed to meet the requirements of B-Double high productivity vehicles. This is in keeping with the motorway network strategy established for the WestConnex program,". It would appear our school zone is planned to be used as a truck thoroughfare. The EIS assumes that Euro IV fuel standards will be in place (not yet legislated) whilst at the same time predicting a large rise in Diesel vehicle use.

6. **Project justification:** "The intersection of Ben Boyd Road and Military Road would operate with longer delays as a result of the project due to changes to access and travel patterns at the Ernest Street and Falcon Street interchanges" The EIS also states that bus times along Military Rd will remain unchanged even if Beaches Link is added on. One of the promised benefits of the project was to improve trip times on Military Rd – this is not achieved.

7. **Out of Data Date:** The EIS has been put on exhibition more than 2 years after the SEAR's was issued so much of the data is out of date.

8. **Change to Local traffic controls**: Any traffic control changes should be carefully studied and the flow on effects understood. The current morning is gridlocked trying to leave the school via Amherst St and Bellevue St with very few other options for diversion

Climate, Sustainability and Environment

Our objection due to poor climate and environmental outcomes are as follows:

Sustainability: is a key unit of learning across many of our subjects and we have an active sustainability club at the school however these projects do not present as a sustainable option.

Waste: The EIS states that > $6 Million Tonnes will be produced with 1 219 200 Tonnes of waste dumped out to sea. The metro tunnel, by comparison, is far smaller and goes under the Harbour. The waste profile of the project is further exacerbated by trying to fit more traffic and infrastructure into an already busy road which necessitates huge amounts of reconfiguration. Given alternative routes and options have not been fully compared it is hard to claim that this is the most sustainable option.

Water Use: The project will use 1327 000 Litres of water used per day (a majority potable).

Green Space: We will lose 7.29Ha of green space in an area where green spaces are already under pressure due to population and pollution. Wastewater (treated) is to be discharged into Willoughby Creek. The EIS identifies a high risk to down street waterways such as Quarry and Flat Rock Creek due to earthworks at construction sites. These creeks already suffer from pollution and are classified as sensitive fish environments so any change in water quality could have a significant impact.

Water Availability: the dam at Cammeray will be lost during the project which puts parks (already drought impacted) at risk as it is the major water supply for Cammeray Oval, St Leonards Park and Tunks Park. These are Cammeray Public Schools main sports fields and weekend sport locations.

Tree Canopy and Urban Heating: 687 Trees will either be removed or put at risk – this will significantly impact our urban heating particularly in and around the Freeway which has large spans of concrete. This will further impact parklands nearby and exacerbate pollution impacts.

Increased Emissions: Our children have suffered through high levels of bushfire smoke which experts confirm were exacerbated if not caused by climate change. This project will produce 784 000 Tonnes CO2e above and beyond doing nothing. The cumulative impact of the smoke event and increasing urban pollution on our children's health is not fully known and should be researched before adding more pollution.

Threatened Species: Our children learn in class about our precious flora and fauna however this project puts at risk 26 threatened species including little penguins, sea eagles, bats and whales.

Contamination found across the route and suspected at Cammeray Golf Course site combined with the local geology combines to increase the risk of contamination reaching ground water In addition the high level of truck movements with makes it clear that this is not a project footprint that works for children, residents or the environment. Sydney Harbour will need to be dredged and the EIS highlights an alarming amount of contamination risk including the risk to threatened habitats…an immersed tube construction has been chosen (i.e lay down on Harbour Floor). Other options would have far less contamination risk but have not been compared.

Flat Rock: The Gore Hill extension has been mentioned in several places however a full risk assessment has not been done. The Gore Hill extension (which crosses into Flat Rock should be the subject to a full EIS and not included in the Conditions of Approval

Action and Mitigations

Health and Safety

Reconsider: Re-consider the route away from densely populated residential areas with a high proportion of children and/or consider a public transport alternative. The project will take place over 5-6 years i.e. a generation children's primary schooling in the area. The Rosalind St site should not be able to be used due to proximity to schools and toxicity risk.

Reissue: the air quality analysis should be completed showing the actual risks to each school in the area (ie CR's should be weighted based on sensitive receiver) taking into account relative elevation and risk, clear information about which houses will have substratum acquisition should be published, reissue visual amenity pictures with clearer artists impressions showing actual buildings.

Conditions of Approval: restrict truck movements to between school hours and outside school 40km zone, restrict dusty activities on Friday afternoons and Saturday mornings due to thousands of children playing sport, institute a dust hotline for schools and pre-schools to call, implement all recommended dust control procedures and provide ongoing independent inspection across all sites for dust and dangerous goods handling. Consider moving schools most impacted to healthier locations and/or providing alternate sports field arrangements for the duration of construction. Include a schedule of staged works as a condition of approval to avoid cumulative impacts. Install an air quality monitor at Cammeray Public School as a Condition of Approval.

Traffic and Congestion

Reconsider: Re-consider the route away from densely populated residential areas with a high number of children. Reconsider works on Willoughby Rd which will directly impact the bus stop used by dozens of children to get to/ from school (opposite Naremburn shops)

Conditions of Approval must include: a plan developed with North Sydney AND Willoughby Council to agree truck routes and contractor parking as a Condition of Approval. All parking must be accounted for and workers/ construction vehicles must be kept off Palmer St Bellevue St and other local roads used by children**.** Based on evidence (attached) that sensitive receivers are receiving the greatest increases and that future pollution will be above PM2.5, all buildings identified as eligible should be granted noise attenuation (especially schools and preschools such as Cammeray Public School), return the same amount of **usable** green space the community….polluted parks are not usable green space. The stack height (or filtration) needs to be reconsidered given the two-storey height and elevated position of schools like Cammeray and Neutral Bay (as per sensitivity analysis) Increasing the stack height however will have greater visual amenity impacts – filtering the stack would not necessitate an increase in height and may facilitate better visual outcomes for Cammeray and surrounding suburbs.

Climate, Sustainability and Green Space

Reconsider: An alternative to the immersed tube design.

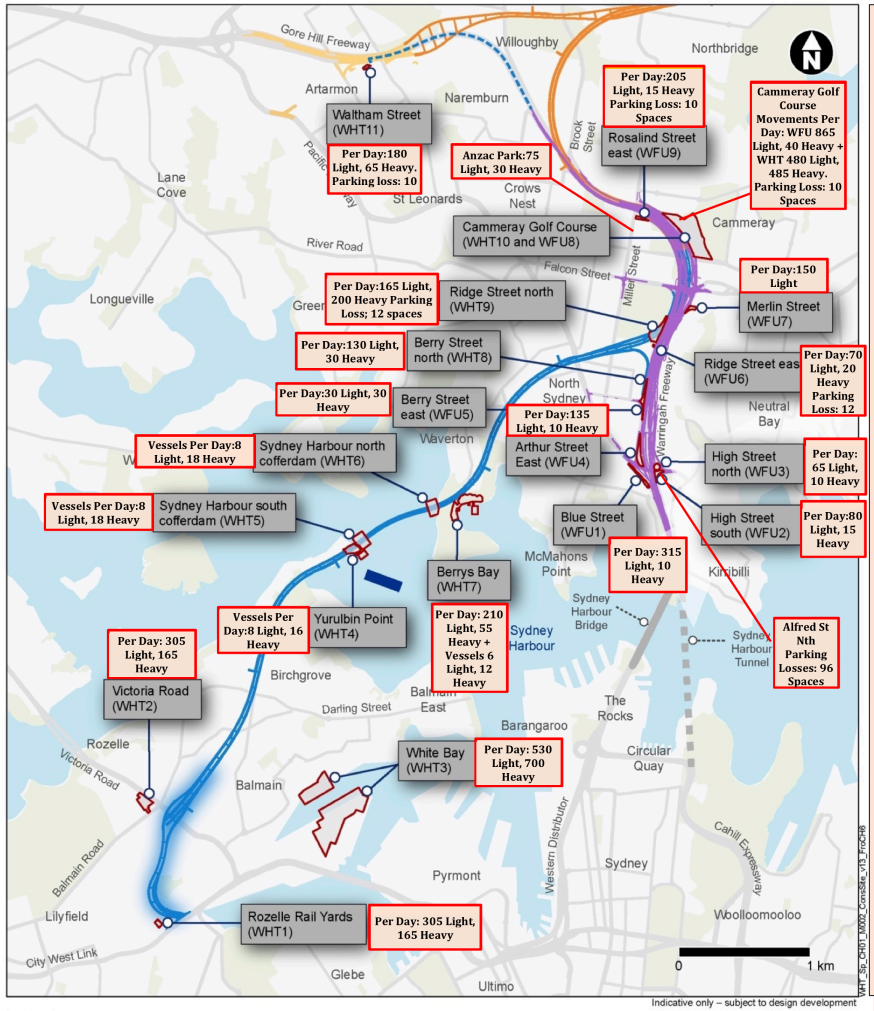
Conditions of Approval: The SEARS requires a full analysis of public transport alternatives, but none has been done. Publish a comparative study showing comparison against all risks and impacts. Replace all lost trees, provide an alternative water source for parks and look for ways to improve the sustainability profile. Gore Hill extension should not be included.

Appendix A: Construction Sites, Traffic and Schools

Western Harbour Tunnel and Warringah Freeway Upgrade
Construction Sites and Vehicle Movements

EIS Exhibition Closes 30th March

Total Construction Vehicles Movements Daily = **6343*** (peak 2021-2024)
Total Known Parking Space Losses = **150** (does not include construction worker parking)



Legend

Schools in Area:

Artarmon Public
Willoughby Girls
Willoughby Public
Northbridge Public
St Philip Neri
Shore Prep
Cammeray Public
Naremburn School
Anzac Park
Neutral Bay Public
Wenona
Cammeraygal High School
St Aloysius
St Mary's
North Sydney Boys
North Sydney Girls
North Sydney Dem
Monte SA College
Shore Cammeraygal
Montessori
Loretto Kirribilli

Balmain Public
Rozelle Public
Inner Sydney Montessori School
St Scholastica's College

Appendix B: Pollution Graphs with Sensitive receivers in Range of Project

An analysis of increased air pollution and local sensitive receiver sites can be found here:

Figure 12-22 Annual mean $PM_{2.5}$ concentration at community receivers
7 µg/m3 legislated by 2025

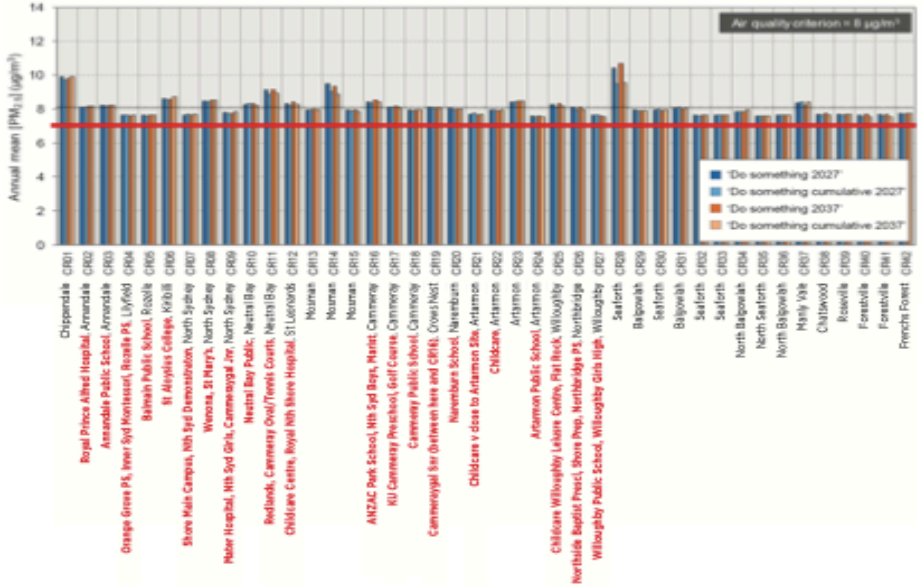
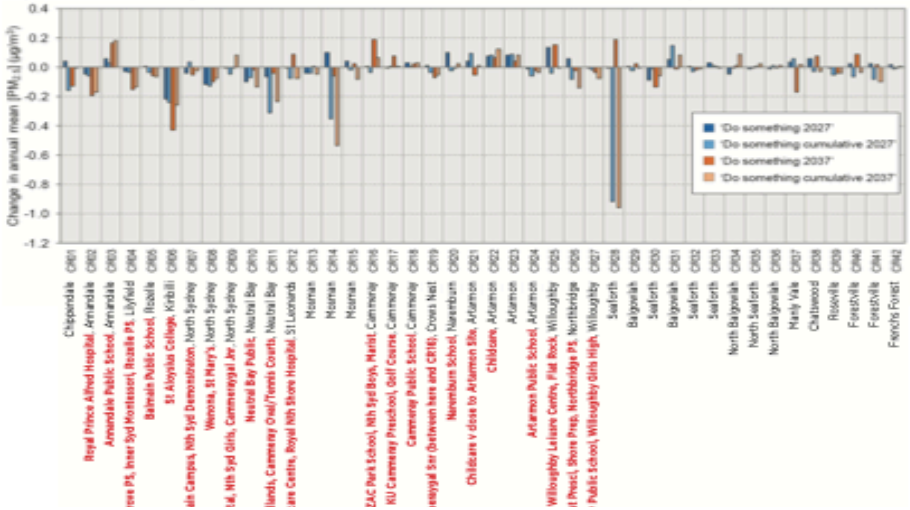


Figure 12-23 Change in annual mean $PM_{2.5}$ concentration at community receivers



Conclusions

The Western Harbour Tunnel and Warringah Freeway project clearly places the motorist over and above the health and welfare of children, thousands of children. When looking for evidence as to why this would be justifiable it is hard to find in the documents presented. The project does not appear to meet the requirements of the Protection of the Environmental Administration Act 1991. The precautionary principle in regard to children's health and welfare has not been taken with regard to the choice of construction method (immersed tube and unfiltered stacks) nor the route (contaminated locations in proximity of 26 schools and residential areas). With regard to generational equity the quality of air will worsen as does congestion on local streets and future generations will be asked to pay tolls both ways on the crossings. The project does not achieve better public transport efficiencies either on Military Rd or on local streets. Given public transport alternatives have not been considered it is difficult to claim that this is the best plan from a biodiversity or ecology perspective and locally is does nothing to improve the valuation of environmental resources.

With regard to project objectives, the project claims to afford the opportunity to relieve congestion on local streets but the data demonstrates otherwise and the documents contradict themselves - in one place saying Military Rd improves and in another that it doesn't. There are many uncertainties with regard to risk assessment and mitigation, such as contaminated soil, work schedules and unknown substratum acquisitions - with many plans and investigations to be done once a contractor is assigned. Given the very sensitive nature of the area (both ecologically and socially) this does not give the school community a high degree of confidence in the project. When looking for reassurance that the project affords benefit the community sought the business case but was refused access to it. The only real benefit appears to be for heavy vehicles (increase of 15%) with large increases in diesel emissions predicted in the EIS. This is again at odds with children living healthy and productive lives in and around the Warringah Freeway…particularly if vehicle standards do not change and filtration is not made part of the project. There are 16 other higher priority projects on the Infrastructure Australia Priority list 2020 it is very difficult to understand why a project with so much inherent risk and poor outcomes would be prioritised above any of these – particularly those in Regional Australia or Western Sydney where investment is so badly needed.