

I write on behalf of the Naremburn Progress Association, a community group representing Naremburn residents and which has been in continual existence since 1901. We OBJECT most strongly to the Western Harbour Tunnel (WHT) and Warringah Freeway Upgrade (WFU) Project in its current format for a number of reasons:

- We object to the lack of a Business Case available for public review, with attendant concerns regarding lack of transparency;
- We object to the lack of any real analysis of public transport options, especially when public transport should be the preferred alternative;
- We object to the “force-fitting” of WFU interchanges onto the existing road network which, rather than lessening road congestion, would appear to only be worsening conditions across a network already operating near peak capacity;
- We object to the lack of inclusion of filtered ventilation stacks, a number of which are in close proximity to sensitive sites;
- Given the above, no ability or costing for retrofitting of filters if/when the need arises;
- We object to the lack of real analysis or recognition of the massive transport and community disruption both during and after construction, extending over several years and across an area covering the entire Lower North Shore;
- We object to the significant risks arising both during the construction phase and post-completion to children and local residents across a range of environmental areas.

### Business case

The lack of a Business Case underlines a real risk that there is no reason for this particular project to proceed. The Business Case should demonstrate the project provides real benefit to the community, both travelling and residential, with costs provided for options considered so as to provide appropriate transparency . The Business case should also show how risks have been mitigated.

### Options

Section 4.3 provides a cursory treatment of other options considered, including the “do nothing” option. One of the considerations marked on Figure 4-3 is a B-Line route from Dee Why to Chatswood, yet this route is not even

mentioned in the discussion of 4.3.5. More in depth analysis of the effects of this option is required, whilst the effects of the existing Northern Beaches B-Line need to be quantified, as it appears to have been very successful since its inception in 2017.

Another potential option that has been previously raised but has not been recognised in the EIS is the construction of a Metro spur from Chatswood to Dee Why via Forestville, Frenchs Forest and Beacon Hill. Initial responses have suggested that technical constraints make the option unfeasible, but without a full and frank analysis the community rightly feels “short changed” – such a stance by the project planners is unacceptable. Reference Plans should commence with a preferred Public Transport stance and this project presents a real opportunity for innovative design approaches to be utilised.

#### Proposed WFU interchanges

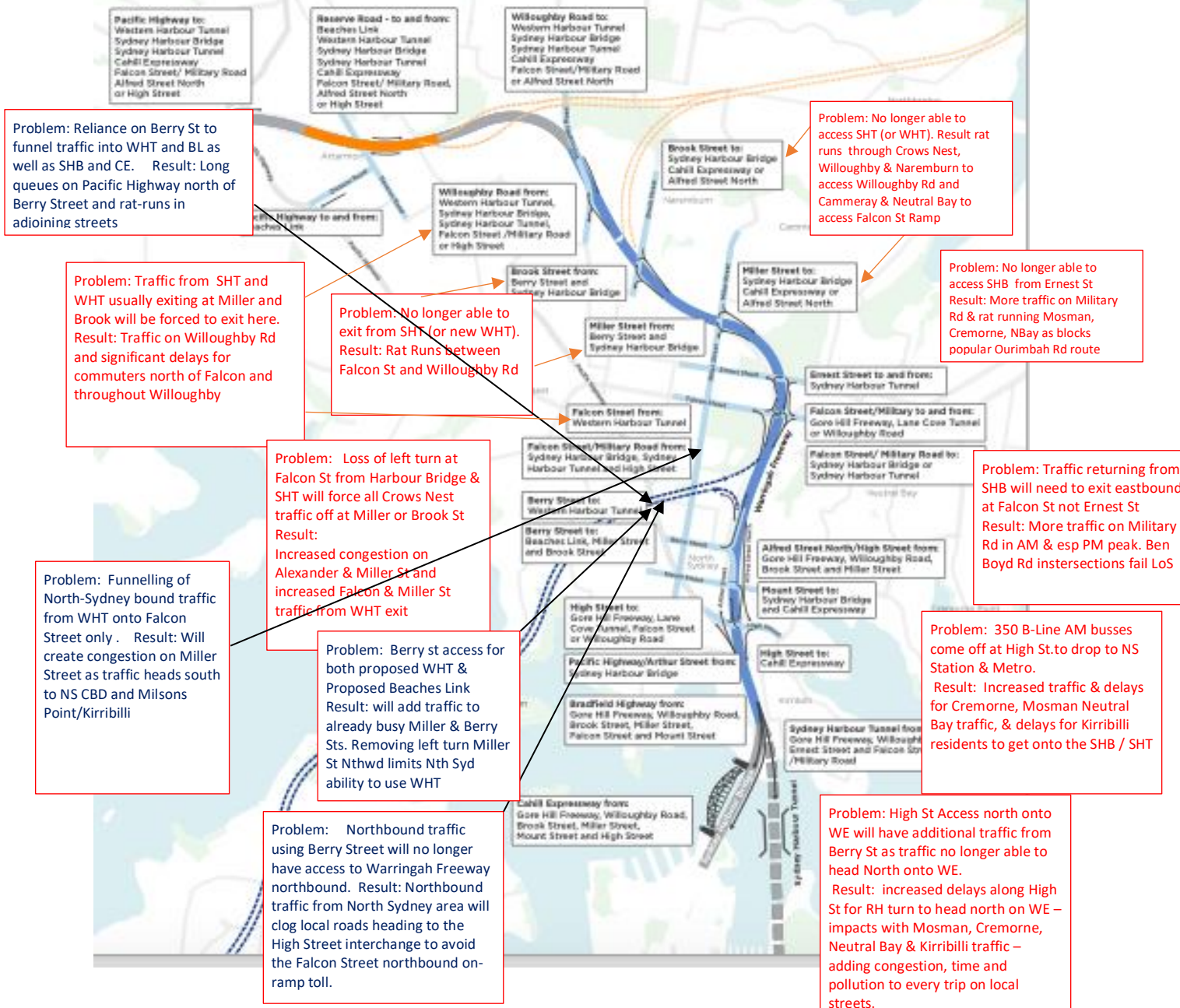
Rather than an upgrade of the Warringah Freeway, the Project is virtually a complete rebuild for the purposes of trying to facilitate the inclusion of several tunnel portals, on and off ramps, ventilation stacks and forecast significantly heavier traffic loads. The reduction in access to/from Brook St and Miller St to SHT especially will lead to the increasing use of rat runs as traffic seeks alternative entry/exit ramps. The EIS also acknowledges that there will be increased traffic pressure along Willoughby Road, an untenable situation given the volume of traffic already carried. The intersection of the M1 off-ramp and Willoughby Rd would also need a significant upgrade to carry any additional traffic, but this in turn would create an adverse environment for any redevelopment of the Naremburn Local Centre, a small shopping area the subject of extended discussions between the community, Willoughby Council and developers.

The schematic map below was released by project planners in an attempt to remove the confusion that had arisen from previous versions. However this clarification then drew into sharp focus how much the on/off ramps and tunnel portals needed to be force-fitted into the existing road network, with the various pinch points flagged and updated in the reworked schematic. These issues must be addressed as the current “solution” is unacceptable.

Problem: This is not a local congestion solution and public transport alternatives (which would not require the rebuild of the Warringah Freeway) have not been considered Result: More traffic and congestion on local roads and more pollution.

Key:  
SHT = Sydney Harbour Tunnel  
WHT = Proposed Western Harbour Tunnel  
WF/U = Warringah Freeway/ Upgrade  
SHB = Sydney Harbour Bridge  
CE= Cahill Expressway

## How to use the new Warringah Freeway Upgrade



### Ventilation stacks

Both the location of stacks near sensitive areas and the proposal that they be unfiltered are grave and unacceptable risks and must be subject to review. The EIS concludes that such filtration is unnecessary and potentially a major cost impost, but no estimates are supplied for either the provision of appropriate infrastructure to facilitate post-completion fitout, or the cost of the filtration equipment itself. Without any costings provided it is virtually impossible for the community to make any call in balancing reduced risk against increased cost.

The positioning of the stacks in close proximity to schools in the area is also of great concern. The project construction footprint is adjacent to a number of schools, so will give rise to noise, dust, particulates and diesel fume exposures to school-aged children for 5-6 years, even under current estimates.

### Extended disruption

With over 600 heavy vehicle movements per day for a 6 year construction period across an as-yet undocumented set of transport routes, plus increased congestion levels as acknowledged by the EIS, the project provides very poor lifestyle outcomes not just for residents living in the area but also for those attempting to travel through the Lower North Shore. Residents resent this poor treatment and the incessant pressure of short term community consultations. It is extremely unlikely that the best solution to a road congestion issue is to build another road. Improved mass public transport would go a long way to alleviating the need for any project such as has been proposed here, and the community stands ready to engage in meaningful discussion towards this end.

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President, Naremburn Progress Association.