

26 February 2021

Planning and Assessment Department of Planning, Industry and Environment Locked Bag 5022 PARRAMATTA NSW 2124

Also via submission portal

Dear Sir/Madam

# SSI-8862 - Beaches Link and Gore Hill Freeway Connection ("the Project")

I am writing on behalf of Wenona School ("the School"). The School is an independent K-12 school for girls. The School has approximately 1,200 students including approximately 50 residential boarders.

Our Central Campus is bounded by Walker, Ridge and Elliott St, North Sydney. The West Campus fronts Miller St and includes the Independent Theatre. Our East Campus sits on the east side of Walker St, with the eastern boundary formed by the Warringah Freeway. On Walker St, the East Campus comprises 207, 205, 203 & 201 Walker St.

Our residential boarding accommodation comprises four buildings, two fronting Ridge St and two Walker St. These buildings are clustered towards the Ridge/Walker St intersection.

The School objects to the Project on the following grounds:

#### 1. Objection due to air pollution

The Project centralises emissions from a long series of tunnels (the Western Harbour Tunnel and the Beaches Link Tunnel) predominantly to a single location (the Ernest St emission stack). On the basis that the tunnels will be well utilised, this concentrates emissions from more than 10km of busy roadway to a single, unfiltered emission stack. Furthermore, over time, any initial reduction in surface traffic emissions will be replaced by future traffic growth, leading to the combination of surface emissions and stack emissions exceeding current levels.

Notwithstanding the material presented in the EIS and its appendices regarding air quality, the School objects to the centralisation of emissions in this way and the incontrovertible addition to air pollution.

Air pollution from any source, and particularly fine particle emissions from traffic sources, are known to have significant adverse health impacts, particularly in school-aged children. The Project's lack of filtration to minimise these emissions, given the known danger of emissions to people of all ages, is unacceptable.

The School requests that best-practice emissions filtration be included as a condition of consent. In the alternative, as a condition of consent, the School requests comprehensive design provisions be made so that retrofitting of emissions filtration is possible in the future.

# 2. Objection due to impact on local traffic and pedestrian amenity

The Project will increase traffic in the North Sydney area, particularly on Miller St and Berry St. This increased traffic will push into many streets, a particular concern given the density of school and pedestrian activity in the area. The schools on Miller St include North Sydney Boys High School, Marist College North Shore, St Mary's Catholic Primary School, Wenona School and Monte Sant' Angelo Mercy College. All of these schools have students crossing Miller St (to access buses) and Ridge/McLaren/Berry/PacificHwy (to access North Sydney trains).

The School objects to increased traffic on these arterial and local streets because of the impact on pedestrian safety and general amenity.

The School suggests:

- a) the Project be amended so that Miller St traffic does not increase as a result of the Project;
- b) given the significant increase in traffic on Berry St given its proposed role as a feeder/entry to the Project, a consent condition be imposed to move the Project's Berry St entry underground. This should occur in the vicinity of the Pacific Highway, effectively eliminating the pedestrian safety risk as students move north/south on Miller St and Walker St; and
- c) additional traffic and the prioritisation of traffic on Miller St, in addition to existing pedestrian movements will further worsen congestion on local cross roads, particularly Ridge St. The School requires a consent condition that the Miller/Ridge intersection be reviewed to optimise pedestrian and traffic flow in **all** directions, instead of the current inefficient signalling arrangements which prejudice Ridge St.

#### 3. Objection re night closures of Warringah Freeway

During the construction phase, the Project envisages overnight closures of the Warringah Freeway, with traffic to be diverted onto roads surrounding the School.

The School objects to this diversion as it will push traffic onto local streets, to the determinant of residential boarders and North Sydney residents generally. This will impact sleep and normal residential amenity.

As a condition of consent, the School requests construction be staged so that the closure of the Warringah Freeway is not required at any time. In the event this is impossible, measures should be taken to ensure all diverted traffic is confined to the Pacific Highway.

### 4. Objection due to risk of cracking, subsidence and similar building impacts.

The Project involves extensive tunnelling beneath the East, Central and West campus of the School, and there are sensitive heritage structures in all of these areas. The School objects to the increased risk of structural cracking and subsidence, which is known to have occurred as a result of other Sydney motorway projects.

The School requests as a condition of consent, that 1) dilapidation reports exceeding normal industry standards be required and b) special design arrangements be made in the vicinity of heritage, sensitive and delicate items.

# 5. Objection due to a lack of transparent consideration of public transport alternatives

The Project EIS contemplates alternative motorway alignments but does not genuinely consider alternatives to a motorway. These include dedicated, integrated public transport arrangements as part of the Project, or fundamentally different solutions, being public transport alternatives. We consider these alternatives are preferable to a dedicated single mode motorway, which perpetuates a dependence on vehicles due to inadequate public transport alternatives.

The School objects to a seeming bias towards toll-based motorway projects and requests genuine consideration be given to visionary and long-term public transport alternatives, akin to the Sydney Metro, London Underground and other major public transport infrastructure.

### 6. Objection due to pollution risk during construction

The Flat Rock Gully area is close to parks and sporting facilities that have a wide range of users, including Wenona students. In addition to the control measures proposed in the Project, the School objects to the lack of real-time, transparent pollution monitoring in this (and in all) areas of the construction of the Project.

The School requests a condition of consent be imposed to require real-time dust/pollution monitoring, hence ensuring prominent, timely and transparent evidence that dust mitigation measures are effective and the public facilities remain safe to use.

### 8. Donation Declaration

I declare that neither the author nor the School have made any reportable political donations in the previous two years.

Yours sincerely,

Abeche

Mr Andrew Leake Chief Operating Officer