15 March 2020

Department of Planning Industry and Environment

Locked Bag 5022

PARRAMATTA NSW 2124

Attention: Director, Transport Assessments Planning & Assessment

**Objection to proposed Western Harbour Tunnel and Warringah Freeway Upgrade Projects - Application Number SSI-8863**

We have reviewed the Environmental Impact Statement to the proposed Western Harbour Tunnel and Warringah Freeway Upgrade Projects ***(“Projects”)*** and we wish to register our strong objection to the Projects due to, among other reasons:

1) The poor Climate and Sustainability outcomes.   
2) The poor Transport and Congestion outcomes.  
3) The significantly high risks to children and residents.

As a family living in Cammeray with young children who suffer asthma and allergies, we fall within the category of “sensitive receptors”, and we therefore hold grave concerns about the consequences for us and our community should the Projects proceed, particularly where independent experts have highlighted that the estimated expenditure of $14 billion required to fund the Projects (together with the proposed Beaches Link project) is not justified, nor should it be a priority project.

The costs to us personally and to our community (set out below) are significant. If we are to bear such costs, then we would expect it to at least be for a project which in fact achieves a return for us, our community and our city ie actual reduction of road congestion over the short and long term. However, time and time again the evidence points to public transport (such as a train or metro) as being the logical solution to easing road congestion. The WestConnex Parliamentary Inquiry submission of Dr Michelle Zeibots (in which she submits that a “metro option linking Brookvale, Mona Vale and the Northern Beaches Hospital Precinct to Chatswood be considered as an alternative option to building the Western Harbour Tunnel and Beaches Link motorway sections”) is pertinent, and we support such a proposal – see <https://www.parliament.nsw.gov.au/lcdocs/submissions/62323/0497%20Dr%20Michelle%20Zeibots_Redacted.pdf>.

Our objections to the proposed route and construction sites are for the following reasons (and the abovementioned desire and expectation for expenditure of public funds to instead be invested in long term sustainable transport – such as a train or metro):

**(A) OBJECTION TO UNFILTERED VENTILATION OUTLETS**

1. We strongly object to the lack of filtration of the ventilation outlets, particularly the TWO in Cammeray. This is especially concerning given our family’s health challenges outlined above.
2. There is a significant body of evidence linking asthma to air pollution. In particular we wish to reference the publicly available submissions (prepared for the WestConnex Parliamentary Inquiry) of Dr Raymond Nassar - see <https://www.parliament.nsw.gov.au/lcdocs/submissions/61864/0210%20Dr%20Raymond%20Nassar.pdf> and of Dr Noel Child – see <https://www.parliament.nsw.gov.au/lcdocs/submissions/61865/0211%20Dr%20Noel%20Child%20redacted.pdf>.
3. In particular, please note Dr Nassar’s conclusion, following his personal research as a medical practitioner and peer review of the scientific literature into air pollution and the resultant health effects, that there are no safe levels of air pollution.
4. Having regard to evidence such as that set out by Dr Nassar and Dr Child, should the Projects proceed, the consequence of this will be that a significant proportion of our children’s formative years will be subjected to constant exposure to the risks associated with construction on a large scale, only to be met at the end of construction phase with two permanent ventilation outlets emitting concentrated tunnel emissions only 600m (approx.) from our home. We are aware of a significant number of families in our local area who also suffer asthma.
5. We appreciate that there is a cost to filtration – and we submit this is a cost that is more than worth the expenditure. Moreover, as a taxpayer funded project, this is the least our community expects if this toxic structure is to be imposed on us. The city of Sydney is known to be prone to weather inversions – filtration is a benefit not only for residents within the 1.2km dispersion zone of the ventilation outlets, but in fact for the whole of Sydney.
6. In a growing population such as Sydney, cars will not merely be taken off surface roads to use the tunnels - the road capacity (and pollution output) is effectively DOUBLED. Plus with TWO unfiltered stacks planned for Cammeray, we are effectively getting THREE TIMES the level of existing emissions concentrated in our suburb.
7. Whilst the Department of Transport (formerly RMS) has previously stated that “total emissions from motor vehicles are expected to continue to fall over the next decade due to new, cleaner vehicles replacing older technology vehicles”, until it is a certainty that Sydney’s electric vehicle uptake is such that future air quality levels are lower or no worse than they are currently, at least the current generation of children in Cammeray and surrounds are being condemned to the health consequences of unfiltered ventilation outlets. Surely, at the very least from a legal liability perspective, it is worth the cost of filtering the ventilation outlets in the meantime?

1. We understand that air ventilation has been offered to homes within close proximity to construction of, for example, WestConnex. While this addresses, to a limited extent, the adverse impacts on air quality within the home, it is unable to address the adverse impacts to air quality for the significant number of children in the area who play sports in local fields, or children who wish to simply play in their own backyard!

**(B) OBJECTION DUE TO USE OF CAMMERAY GOLF COURSE AS A CONSTRUCTION SITE**

1. We are concerned about, and object to, the proposal to use a significant proportion of Cammeray Golf Course as a construction site for the project as:
   1. this land was ear-marked as public land by Alderman William Tunks in the mid- 1800s (Tunks was a great advocate of allocating public land all around the Lower North Shore e.g. St Leonards park, Tunks Park, Primrose Park);
   2. the Golf Course has historical significance and is also regarded as an area of significant local recreational importance;
   3. it will require the removal of a significant number of trees and risk exposing our family and our community to toxic silica dust; and
   4. there will be significant construction noise that local residents are to bear for an extended duration,

- and all for nothing but an expensive road tunnel that will not yield any benefits for our family or our community!

1. The trees, which North Sydney Council had the foresight to plant decades ago, act as an important buffer from the pollution, noise and visual appearance of the Warringah Freeway, which cannot easily or quickly be replaced once gone. This is a significant loss of amenity for our local community.
2. Moreover, being located in a valley, the construction noise from the Golf Course will echo and easily travel, particularly whenever there are southerly winds (which Cammeray is particularly prone to) – whilst an acoustic shed is better than no acoustic shed, particularly to limit toxic silica dust being released into the air, it will be of limited value in reducing construction noise given the topography of the areas surrounding the Golf Course.
3. We understand that construction is intended to occur 24 hours a day, 7 days a week, for the duration of the estimated 5 to 6 years it will take to complete the WHTBL Project. Having regard to testimonies given at the WestConnex Parliamentary Inquiry and of friends impacted by NorthConnex, we can be certain that noise pollution will adversely affect our family’s sleep and therefore concentration, stress levels and health (including mental health).

**(C) OBJECTION TO HIGH NUMBER OF CONSTRUCTION VEHICLES**

1. We object to the Projects which will require a high number of construction vehicles in our community.
2. The quoted number in the EIS of additional trucks per hour in Cammeray to facilitate the project for the 5+ year duration of the project is of concern.  This poses significant safety concerns for the high number of children in the area who walk to school, as well as high potential to create traffic gridlock on local streets. Related to this, the planned closure of various existing Freeway ramps will inevitably result in “rat-running” in local Cammeray streets (which introduces safety issues for the large number of children who walk to/from school) – by way of example, we note that it is frequently the case that cars do not stop at the pedestrian crossing on Carter Street!
3. Local experience with WestConnex demonstrates that despite efforts by the contractor to bus in workers or encourage public transport usage, workers suck up on-street parking around major construction sites. The contractor should be required to provide parking for 100% of workers on site to protect resident amenity and safety for children walking to/from school.

**(D) OBJECTION TO DREDGING OF WATERWAYS**

1. We object to the proposed method of dredging Sydney Harbour in order to construct the WHT. We are concerned about the dredging of Sydney Harbour and the impacts of this to water quality and marine life.
2. Greenwich Baths are at high risk of contamination – 5+ years is a long time for the regular and visiting users of the Baths to forego this amenity, for a project that will not ultimately benefit our community or our city in the long term.

**(F) OBJECTION TO SHALLOW TUNNELLING**

1. We object to the Projects as tunnelling will be shallow in residential areas through Cammeray, Crows Nest and in the Inner West. In some places it’s less than 50 metres, and such homes will feel vibrations and hear the noise.
2. We are concerned for friends whose homes (which are subject to conservation or heritage orders) are situated along the proposed construction corridor and are at significant risk of damage from tunnelling, blasts and heavy vehicle movements.

In summary, we object to the Projects as they:

* are based on false assumptions about public transport demand;
* Will not achieve their stated goal of addressing long-term traffic congestion in Sydney;
* Are not properly tested against competing public transport projects;
* Fail to adequately address impacts on the community, especially noise, air quality and health impacts for local residents;
* Put homes and businesses at risk of damage from vibrations, settlement and ground movement;
* Will not require the filtration of exhaust stacks, at a risk to public health;
* Will pollute our harbour with toxic sediment putting Sydney Harbour’s marine life at risk;
* Will have an adverse impact on greenhouse gas emissions and contribute to climate change; and
* are not justified by any publicly released business case.

Global experience of toll road construction has demonstrated conclusively that projects like this increase air pollution, encourage more car use, fleece road users with exorbitant tolls and eventually fill the increased road capacity they create.

Yours sincerely,

[Names publicly withheld]