



INNER WEST COUNCIL

SUBMISSION FROM INNER WEST COUNCIL TO ROADS & MARITIME SERVICES

ON THE REFERENCE DESIGN FOR THE PROPOSED WESTERN HARBOUR TUNNEL MOTORWAY

NOVEMBER 2018

Introduction

Council appreciates the opportunity to comment on the reference design for the proposed Western Harbour Tunnel (WHT) motorway. As only limited detail has been provided in the reference design, Council's submission is brief. As far as Council is aware, an Environmental Impact Statement (EIS) would be released for public comment some time in the first half of 2019, and it is expected that extensive details on the WHT will be included in the EIS.

Inner West Council continues to oppose inner-Sydney motorways, preferring alternative transport options that include public transport, active transport, modest/targeted road network improvements, transit-oriented development and travel demand-management. Council is concerned about a number of strategic issues that are created by inner-Sydney motorways, including reduced economic productivity, reduced liveability, induced traffic, declining air quality, mode-shifting from public transport and the equity impact of tolls.

As was the case for WestConnex, there is lack of strategic justification for the WHT motorway. Nor has the reference design included sufficient information on key features, such as traffic forecasts, that would support the claimed benefits of the project.

In particular, Council consistently identified prior the WHT being proposed that the design of WestConnex Stages 1 and 3 would result in congestion at the intersection of the City West Link and the ANZAC Bridge, to which the Government responded that this would not be the case. Asserting now the WHT is required to alleviate this choke-point demonstrates the poor planning and inconsistency that has been a feature of WestConnex and this project.

More detail on Council's strategic arguments against inner-Sydney motorways is included in its August 2018 submission to the NSW Legislative Council's Inquiry into the impact of the WestConnex project, available on the [inquiry's website](#). Appended to the inquiry submission is a review of the project's business case by SGS Economics and Planning. Both documents conclude the project's business case is poor.

Council has noted the inquiry submission from transport academic Dr Michelle Zeibots that speculates that a key purpose of the WHT and F6 projects are to feed traffic into WestConnex to improve its profitability. This is particularly in the peak period when WestConnex traffic volumes are predicted to be low in the absence of these other projects. This submission is available on the [inquiry's website](#). Council objects to the continued expansion of the motorway network (with all its negative consequences) in the interests of enhancing the viability of private tollway projects.

In October 2017, the then newly-elected Inner West Council resolved that *“Inner West Council formally adopts a position of continued opposition in the strongest terms to the WestConnex project, both approved and future stages including Stage 3, consistent with the opposition of the former councils of Ashfield, Leichhardt and Marrickville.”*

In December 2017 Council had resolved to *“Write to the Minister for Roads expressing its opposition to the Western Harbour Tunnel and Beaches Link project as part of its overall position of opposing inner-Sydney motorways and preference for public transport options.”*

Notwithstanding this opposition, Council continues to work with the NSW Government, Sydney Motorway Corporation (SMC), project contractors and the community to ensure that impacts are minimised and benefits are gained wherever possible. In doing so, Council has raised many issues about local impacts from WestConnex - environmental, health, traffic, transport, construction and economic impacts, as well as lack of adherence to good planning and management practice. Council is concerned that these impacts will be extended in duration and spatial extent by the WHT, should it proceed.

Council has been particularly concerned about the health impacts from the construction and operation of WestConnex. For construction, identification of these issues is based on the lived experience of Haberfield-Ashfield and St Peters residents affected by Stages 1 and 2 from late 2015 to date. Ill-health has resulted from sleep deprivation caused by night works and from construction dust.

Council demands justice for the residents of areas negatively impacted and insists upon the NSW Government attending to their duty of care for all future work. Council continues to maintain that no further works should proceed until areas that are currently being impacted have all safety and health issues addressed and resolved.

For operation, the main issue is the impact on air quality from the unfiltered ventilation facilities and increased surface traffic. Council continues to object to the absence of stack and in-tunnel filtration, which is not world's best practice. As a result, surrounding residents and motorists within tunnels would be subject to unacceptable exposure to air pollution.

Council insists that the above WestConnex construction and operational issues are not extended to other parts of the Inner West Council area by the WHT. There should be consideration for the cumulative effects of WestConnex stages 1, 2 and 3 plus the WHT. To date each project has been treated separately and it remains the overall impact on the broader Sydney community is not being addressed.

Council notes that the WHT and Beaches Link are two separate motorway projects that would join at the Warringah Freeway at North Sydney, and that both projects are being progressed simultaneously. As only the WHT project will directly affect the Inner West Council area, the Northern Beaches Link has not been considered in this submission.

A draft version of this submission was considered by Council at its 30 October and 6 November 2018 meetings. Prior to these meetings, comments were received from Councillors and a Rozelle resident, and an amended recommendation was drafted to allow these comments to be integrated into the submission. Comments from Councillors have also been integrated into the submission. Should any additional comments be forthcoming from Council after the final version has been submitted by the 1 December 2018 due date, these will be forwarded to RMS as a late addendum.

Council's comments on the reference design

Construction activities in the harbour at Yurulbin Point

It is noted that these activities are described on Page 38 of the reference design. Council is concerned about the impacts on marine life of dredging the harbour floor for the immersed tube, and the risk that this activity (along with construction of the cofferdam) will lead to contaminated sediments polluting the harbour. All construction activities would impose significant noise, vibration, health and other impacts on nearby residents for several years, particularly those at the end of Louisa Road and in Numa Street, Birchgrove.

Council is concerned about the potential health impact to local residents from acid sulphate soils. Dr. Bill Ryall, a local resident and an environmental scientist recently made a submission to the WestConnex inquiry, available on the [inquiry's website](#). In this submission, he warned about the impacts of acid sulphate soils, as follows:

"In addition to the anthropogenic contaminants, sediments excavated for placement of the immersed tubes at the ITWHT and for treatment facilities at Glebe Island/White Bay are "acid sulphate soils" that contain naturally occurring iron sulphides. On exposure to the atmosphere or to oxygenated water the iron sulfides produce sulphuric acid, which gives rise to increased mobility of heavy metals. In addition, the acid sulfate soils contain naturally occurring hydrogen sulphide (H₂S – "rotten egg gas"), which is toxic and is highly odorous even at extremely low concentrations (less than 1 part per million). The risk posed by the acid sulphate soils was not addressed in the Project Update."

Further concerns are the shallow depth of land tunnels at Yurulbin Point, with the consequent potential for cracking of buildings, and the inherent construction risks involved in joining the road header (land) tunnel to the immersed tube (harbour floor) tunnel.

Council is also keen to ensure that the temporary relocation of the Birchgrove Ferry Wharf does not have a negative impact on ferry users and local residents, and that this wharf is fully accessible.

Council notes that RMS is aware of tunnels from former coal mines in the vicinity of the WHT route. Council seeks reassurance that these tunnels do not pose a risk in the construction of the WHT.

Construction within the park at Yurulbin Point

It is noted that this site is described on Page 39 of the reference design. Council acknowledges that Yurulbin Park is owned by the NSW Government (not Council) but continues to express opposition to any piece of open space that is removed (permanently or temporarily) for motorway construction. Yurulbin Park is no exception.

Although the tunnelling site within the harbour next to the park would be within an acoustic shed, Council is still concerned about noise, dust and vibration impacts on residents given their close proximity. These impacts would come from a range of activities within and around the park, including noise from machinery and barge movements. Evidence from the WestConnex inquiry shows that these acoustic sheds have not worked to fully prevent impacts.

Council has doubts that all spoil can be removed without impact on the traffic on the main roads and narrow local roads in Rozelle, Balmain and Birchgrove – all within densely developed residential areas. Council is concerned that use of Louisa Road and adjoining

roads for light vehicle movements to/from Yurulbin Point would also create a significant traffic impact on these narrow streets.

Council is adamant that be no possibility that workers park anywhere near the former Balmain Leagues Club and Yurulbin Point construction sites, as parking demand is already strong on surrounding residential streets.

Construction site at former Balmain Leagues Club site

It is noted that this site is described on Page 40 of the reference design. Earlier in 2018 when use of the former Balmain Leagues Club ('Tigers') site for spoil removal was announced, Council formally expressed its opposition to use of this site. Council is concerned it would result in significant construction impacts and would unduly delay redevelopment of this site, eliminating any possibility of a Tigers Leagues Club being established in the new development.

Although spoil trucks would use main roads to access this site (entering from and exiting to Victoria Road) and truck loading operations would occur within an acoustic shed, there would still be noise, vibration, dust, road safety and congestion impacts from the significant number of truck movements and 24/7 operations. Given the high number of daily movements, it is likely that trucks will be awaiting their entry slot on Victoria Road and/or narrow residential streets surrounding this site, with consequent noise and traffic impacts.

Residents at the rear of the site on Moodie, Waterloo and Darling Streets are within close proximity, so would be most vulnerable to impacts - as would residents and children attending Rozelle Primary School on the opposite side of Victoria Road and businesses adjacent and opposite the site on Victoria Road.

Impacts from Tigers site would be in addition to impacts from the Victoria Road construction site (part of the Iron Cove Link component of WestConnex Stage 3B). Residents and businesses on or near Victoria Road from the Tigers site through to the Iron Cove Bridge would endure noise, vibration, dust, truck diesel emissions and truck traffic impacts from both projects.

Local residents are already concerned about existing traffic congestion on main roads around the site, including Victoria Road, Darling Street and Balmain Road. They are also concerned that the proposed partial closure of Moodie Street as part of WestConnex Stage 3B would exacerbate traffic impacts, as traffic would not be able to avoid the Balmain Road / Victoria Road intersection. This build-up of traffic would create traffic safety issues for all road users – particularly pedestrians.

The high frequency of trucks accessing this site would create an unacceptable road safety risk for the high number of students and their parents walking, cycling and travelling in cars to access local schools. The schools most affected would be Rozelle Primary School and the Balmain Campus of Sydney Secondary College. The risks would be at their greatest from potential conflicts between trucks, cyclists and cars at the intersection of Balmain and Victoria Roads and where trucks cross the footpath at the Victoria Road frontage to the site.

Parents associated with Rozelle Primary School are already concerned about air quality impacts on school children from the operation of the Tigers site. Impacts would be from truck diesel emissions and dust emitted from spoil handling, combined with existing surface traffic emissions from Victoria Road and future emissions from the Victoria Road stack, proposed as part of WestConnex Stage 3B. It appears most health and air quality experts agree that air pollution at any level has a negative impact on health, and this impact is greatest amongst children.

The noise impact on children's learning at these schools from the operation of the Tigers site is also a concern to local parents.

Finally, Council is concerned that traffic congestion caused by construction trucks along Victoria Road near the Tigers site will negatively affect the multiple bus services in operation.

Construction site at White Bay & Glebe Island

It is noted that this site is described on Page 41 of the reference design, where part of the White Bay / Glebe Island port area would be used for barge logistics, handling of tunnel spoil and dredged material, and construction/storage of the concrete tunnel (or 'immersed tube') sections to be laid on the harbour floor. Although the reference design states there will be "*rigorous and comprehensive environmental procedures for sediment management*". There would however still be environmental and safety risks involved in handling contaminated material from the harbour floor.

Council is concerned about the cumulative impacts from all construction-related activities proposed to be carried out at White Bay and Glebe Island, as well as impacts from the redevelopment of the White Bay Power Station site, should that development proceed simultaneously. These impacts will be added to existing impacts from the White Bay passenger cruise terminal.

Proposed construction-related activities include parking/stabling for WestConnex, multi-user facility and concrete batching plants. Council seeks reassurance that the NSW Government will undertake an assessment of cumulative impacts rather than relying on separate assessments of each of these activities. Council's main concerns about cumulative impacts relates to noise impacts on surrounding residents from 24/7 activities – particularly those residents in southern parts of Balmain and in parts of Pyrmont fronting Jones Bay opposite the site, within the City of Sydney Council area.

A further concern is congestion and road safety impacts from the significant number of large trucks that will service these activities via James Craig Road and City West Link Road. These truck movements would exacerbate existing congestion at major intersections in the area, including the intersection at The Crescent and City West Link Road. Even if the phasing of lights at these intersections were to be altered in an attempt to improve traffic flows, congestion would still be significant due to the sheer number of trucks involved.

It is appropriate that the WestConnex Stage 3 approval has ruled out use of Robert Street. Council continues to argue that trucks servicing the other proposed construction uses at White Bay not be allowed to use that street, and that they be restricted to James Craig Road. Robert Street is already heavily congested, and due to the number of small businesses fronting that road it is not suitable for large trucks.

Following is Council's estimate of daily truck movements to/from White Bay via James Craig Road:

- multi-user facility - approx. 1,200 truck movements/day;
- concrete batching works – approx. 2,000 truck movement/day;
- WestConnex Stage 3 - approx. 280 truck movements/day;
- WHT - approx. 130 truck movements/day (includes movements to/from White Bay stabling area and Tigers site);
- Sydney Metro (rail) – approx. 460 truck movements/day; and
- TOTAL truck movements – more than 4,000 truck movements/day.

This adds further weight to Council's argument that the NSW Government needs to undertake an assessment of cumulative impacts, not just rely on individual assessments of uses proposed for White Bay and Glebe Island.

Council expects that parking will be provided at White Bay / Glebe Island for all WHT workers, and expects there would be procedures in place to ensure that workers have no option other than use the parking provided. It is imperative that workers are not able park on streets near WHT construction sites at the RRY site, Victoria Road and Yurulbin Point, as all surrounding streets are already subject to heavy parking demand.

Council also expects that all WHT truck movements to/from construction sites and the stabling area at White Bay would be carefully co-ordinated using GIS tracking and communication technology. It is imperative that ad-hoc stabling on streets and queuing of trucks entering sites is avoided.

Although construction trucks would use main roads (not residential streets), concerns are still raised about congestion and road safety impacts (discussed above) and ambient noise affecting residential areas in Rozelle, Balmain, Lilyfield and suburbs along the main trucking routes to the west. It is expected that ambient noise would be an issue given the sheer number of trucks from multiple activities and movements occurring 24/7.

Construction site at the Rozelle Rail Yards (RRY) site

It is noted that this site is described on Page 42 of the WHT reference design, where key activities would be fit-out of WHT ramps and ventilation facilities. Given the site would not be used for spoil removal, it is expected that most construction activities would be carried out during standard daytime construction hours.

As there are many residents living within close proximity to this site and these residents will also endure years of construction impacts from WestConnex Stage 3B, it is imperative that noise and other impacts from this site are minimised across the board and restricted to daytime hours.

Council is also concerned that use of this site for WHT will delay completion of the RRY recreation area.

Other issues

The image on Page 27 of the reference design shows a road connection beneath Victoria Road (for the New M4 ramps) at the same location a walk/cycle connection was shown in the WestConnex Stage 3 EIS. Council is concerned that this vital walk/cycle connection may be removed to accommodate these ramps. Consistent with the view expressed in Council's WestConnex Stage 3 EIS submission, the existing (former freight rail) passage beneath Victoria Road should be used as a walk/cycle connection and a future light rail connection to White Bay.

The image on Page 27 also shows a minimum-width walk/cycle bridge across City West Link Road to the RRY recreation area. Council is concerned that this minimum-width bridge will replace the wide, landscaped walk/cycle 'land bridge' proposed in the WestConnex Stage 3 EIS.

In its WestConnex Stage 3 EIS submission (and at every opportunity since), Council has expressed strong opposition to the removal of Buruwan Park, which RMS has informed Council is necessary to create road access from the Crescent to the WHT portal. Council

acknowledges that this park is owned by the NSW Government and new areas of open space will be created elsewhere, such as at the RRY recreation area. Notwithstanding, Council remains opposed to removal of all areas of publicly-accessible open space, regardless of ownership – particularly as the Inner West has a shortfall of open space.

It should also be noted that Buruwan Park contains a thriving ecosystem. The RRY recreation area will not provide a similar ecosystem nor support the rare plant and animal species within regenerated bushland areas that will be lost because of WestConnex and WHT.

The loss of Buruwan Park may also compromise the existing bicycle route between Jubilee Park at Glebe and Ultimo-Pyrmont and the CBD. Buruwan Park is currently part of an easily accessible, alternative and quiet bike route that joins the major, heavily-trafficked bike route at Lilyfield Road.

Removing the park would mean cyclists would have to travel up the very steep Bayview Crescent and either dismount and carry their bikes down the stairs to Johnston Street to access Jubilee Park, or would have to travel back Kentville Avenue where it joins Johnston Street. The latter would mean cyclists will be forced to travel onto a busy road at the congested Johnston Street / White Bay intersection.

At the operational stage, Council is concerned that the WHT (in conjunction with other urban motorways) would increase traffic across Sydney through the 'induced traffic' effect. Council is particularly concerned that the WHT would significantly increase traffic along Johnston Street and The Crescent at Annandale – the main feeder roads to the WHT portal at the Rozelle Interchange. After completion of the WHT, these roads would service the main traffic 'desire line' between the Inner West and suburbs north of the harbour.

Although classified as State Roads, Johnston Street and The Crescent are lined with residential, school and local shopping uses, making them unsuitable for increased traffic. Council would prefer that traffic on these roads is *reduced*, and that some of the vehicle movement space is converted to bicycle lanes.

Consistent with Council's position on WestConnex and other motorways, Council has strong concerns about unfiltered emissions from ventilation facilities. Council notes that the three stacks within the RRY site will serve both WestConnex Stage 3B and the WHT. The description of "*stronger measures on tunnel emissions*" on Page 20 of the reference design is noted, but Council continues to argue that, as emissions have a negative health impact at any level, all ventilation facilities must be filtered. Council is also concerned about their visual impact.