



From: Meredith Foley, on behalf of WEPA

To: Mayor and Councillors, WCC

Re: Willoughby City Council General Meeting 20 April 2020 - Agenda item 15.6 Council submission on Western Harbour Tunnel EIS

Date: 19 April 2020

I am writing on behalf of WEPA to comment on Council's draft submission on the EIS for the Western Harbour Tunnel and Warringah Freeway Upgrade, to be considered at Council's meeting on 20 April.

I would like to endorse, on behalf of WEPA, the comments made by our member, John Moratelli, in relation to the draft WCC submission, which are at attachment A below.

WEPA and a range of other community organisations and individuals have identified on a number of occasions the deleterious impacts which the proposed project will have on WCC residents. In particular, we have indicated our belief that the very basis of the proposed project has failed to meet the Government's own requirements.

The Government's own planning framework and the Secretary's Environmental Assessment Requirements (SEARS) require that there be a rigorous consideration of alternatives when projects such as this are mooted. In this case, there should have been an examination of the relative benefits to the community of a range of feasible public transport options. The need for this consideration of alternatives has been made clear in Mr Moratelli's comments and also in the objection lodged by North Sydney Council.

This project if it proceeds will have major, long-term impacts on our community health, welfare and amenity as well as our environment with very few, if any, offsetting benefits for residents of Willoughby LGA.

We would urge WCC to press the need for consideration of public transport alternatives and to utilise the points made in the attached submission.

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Comments by John Moratelli on WCC submission on Western Harbour Tunnel EIS

This project which is a motor vehicle focused infrastructure upgrade, pays scant regard to how public transport and active transport connections will be addressed and as such its contribution to achieving the strategic vision for Sydney contained in the Sydney Region Plan has to be seriously in question. (page 3)

COMMENT

While true it is that the project pays scant regard to the matters mentioned it is insufficient, given the deleterious impacts of the project as currently proposed, to fail to mention that alternatives to the motorway (which would address the directions set out in the directions set out in the Greater Sydney Region and District Plans) aren't adequately considered, even though the SEARS requires alternatives to be considered. I discuss this in more detail in my comments below.

The draft EIS also fails to mention that Willoughby's Local Strategic Planning Statement has a number of objectives inconsistent with the Beaches Link part of the project but consistent with improved public transport along the Warringah Road corridor to Chatswood namely:

- Developing Chatswood's role as a true transport hub for Willoughby and the North Shore
- Connecting Willoughby's network of centres with each other and with Greater Sydney by mass transit
- Developing Chatswood as a key commercial centre and integral part of the Eastern Economic Corridor

This is a fundamental failure of the entire process which needs to be mentioned. North Sydney Council's submission -

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SUB-9305%2120200326T040100.508%20GMT>

deals with this far more adequately e.g.

4.1 TRANSPORT PLANNING

Summary

The methodology applied to the development of the project is questioned. An analysis of the project methodology against best practice How We Plan Transport (TfNSW 2016) transport planning processes is provided below. A number of inconsistencies are identified, including: a lack of clear problem definition and analysis; omission of benchmarking and case studies; limited non-motorway options analysis; use of out-dated modelling inputs/ growth assumptions and an absence of consideration of the impacts of the Sydney Metro West

project. The Sydney Metro West project is further progressed than the WHT and WFU, and will result in a significant reduction in traffic demand in the Rozelle area. It's exclusion from WHT and WFU modelling is fundamental as its inclusion in the analysis would potentially further bring into question the need for the WHT and WFU proposal.

4.1.1 Travel Behaviour Analysis

TfNSW's How We Plan Transport best practice transport planning manual identifies analysis of ABS journey to work data, Opal trip data, household travel survey data and travel behaviour modelling as the starting point for understanding current travel behaviour in the project precinct. This analysis has not been provided in the EIS. Without a clear understanding of travel patterns/problems in the project area, it is unclear:

- what problem/s the project is intended to address;*
- how the project team has determined appropriate project options for investigation; or*
- how the proposed projects address the Vision for Transport detailed in the State Government's Sydney Region Plan and Future Transport Strategy.*

The overall community engagement approach by TfNSW (formerly RMS) has generally been appropriate for this phase of the project, however specific consultation with Willoughby City Council did not occur. (page 3)

COMMENT

It is just not correct to say that the overall approach has been appropriate. School communities were given insufficient time to lodge submissions given the school holidays, the need to elect new P&Cs and then the COVID-19 crisis. Some relevant information in relation to harbour contamination was marked 'commercial in confidence' and not released. The business case for the project has not been released.

It is considered that the construction and operation of the Northern Beaches Link and Gore Hill Connection project should lead to minimal short term impacts on the existing traffic and transport system and ultimately provide a positive whole-of transport outcome for all users, in particular sustainable transport modes. (page 6)

COMMENT

It is difficult to see how this statement can be justified in light of other comments in the draft e.g. in relation to the destruction of Willoughby South local centre due to traffic impacts.

It is particularly difficult to see how this statement can be justified in relation to the Beaches Link when the EIS hasn't even been released and significant concerns have been raised in relation to the congestion impacts of the work site on Flat Rock Drive due to the need to deal with high numbers of truck movements in and out of the site.

The three stage traffic modelling approach used is comprehensive and appropriate. Notwithstanding, there are a number of issues that need clarification so that Council has confidence in the models developed and their results:

1. Do the models reflect the provision of the latest information on land use and transport provision such as the changes in land use anticipated in the Chatswood and St Leonards Strategic Centres as well as the local centres within Willoughby and within the North District.
2. Do the models include all existing and new mass transit modes such as the Metro City and South West, B-Line, patronage levels and changes to transport mode splits.
3. Clarification on the difference in traffic performance results of introducing a toll to the Sydney Harbour Bridge and Sydney Harbour Tunnel (the approach used in the EIS) as compared to the toll free situation (retain status quo).
4. Clarification on why the forecast heavy vehicle volumes using the Sydney Harbour Bridge following the commissioning of the Tunnel are still high.
5. Clarification of the meaning of the network measures, as many of the performance indicators get worse with the project. How do any measures relate to the model operation and what are the implications for the model results provided in the EIS? (page 24)

COMMENT

It is inappropriate to state that the traffic modelling approach is appropriate if the modelling itself is unreliable because public transport alternatives have not been considered. Specifically, in relation to point 2, the modelling has not taken into account the congestion impacts of the B line¹ and, even assuming that the Metro City and South West has been considered as part of the modelling, modelling in relation to uptake of public transport has consistently and grossly underestimated uptake². Further in relation to point 2, the modelling has not considered the additional impact of the proposed Sydney Metro West, the proposed B2 line along Warringah Road to Chatswood Station, or the synergistic effects of these various public transport projects taken together.

Road Based Public Transport

Provide an efficient, reliable and safe 24/7 road based public transport link between Gore Hill Freeway and Sydney CBD at York Street:

- **Extend and connect the 24/ 7 T2 Transit Lane on Gore Hill Freeway (eastbound) to the proposed southbound bus lane, west of Miller Street.**

¹ See GIPA response – Annexure A

² Sydney Morning Herald article 19/2/20 "Public transport growth hurtles past NSW government predictions"

- **Provide a new 24/7 bus lane (northbound) from Sydney CBD (York Street) to at least Miller Street.**
- **Provide a transit lane or bus lane (preferred) between Miller Street interchange to connect with the existing 24/ 7 T2 Transit Lane on Gore Hill Freeway (westbound).**
- **Retain the 24/ 7 T2 Transit Lane on Gore Hill Freeway (eastbound and westbound) and Lane Cove Tunnel (eastbound) at all times.**
- **Bus service routes and frequency should be mandated so that the Tunnel provides improved public transport provision between the lower north shore/ northern beaches and the inner west. It is not considered acceptable to ‘provide the opportunity’ only. (page 28)**

COMMENT

Whilst efficient and reliable public transport is a laudable objective, it needs to be recognised that such public transport does not need to be ‘road based’ and that a number of projects which are relevant to the modelling, such as the Metro City and South West and the Sydney Metro West, are not. The fact that the impact of these projects, and road based projects such as the B line and the proposed B2 line along Warringah Road to Chatswood have not been properly considered raises concerns that a commitment to a toll financed motorway solution will create a financial imperative which will preclude consideration being given to road based public transport measures such as those suggested. In this respect, it needs to be noted that e.g. the number of JTW in private vehicles from NBLGA to Sydney LGA is about 5,400³. It also needs to be noted that there has been a consistent refusal by the NSW government to release the business case justifying this project.

Consider introduction of congestion charging on the Sydney Harbour Bridge for both directions as a means to minimise the increase in commuter traffic and maximise the duration of, and maintain an acceptable level of service on, this link. Tolls can be applied to time of day and vehicle type to achieve the operational objectives and performance service levels (page 30)

COMMENT

Whilst the introduction of congestion charging is a sensible measure, it was specifically excluded from consideration as part of the EIS due to NSW Government policy as I remember, but I haven’t so far been able to find the reference to this in the EIS.

2.6.1 Target customers of the project (page 20) Public transport users are customers of the project and should be included in the list.

³ Census journey to work data

2.6.2 Non-target customers of the project (page 20) Active transport users are missing and should be considered. (page 33)

COMMENT

I don't see the point in amending the EIS to include these groups when the project as it stands makes no provision for them. In fact it will make things worse for them as compared to alternatives.

GENERAL COMMENTS

The submission also fails to mention:

- Air pollution analysis is based on the assumption that Euro 6 emission legislation will be adopted in Australia for LDV and PCs from 2021, whereas this is not happening.