

Submission
No 370

**INQUIRY INTO IMPACT OF THE WESTERN HARBOUR
TUNNEL AND BEACHES LINK**

Name: Name suppressed

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Submission to Parliamentary Inquiry into the Western Harbour Tunnel. June 15th 2021.

INTRODUCTION:

The Western Harbour Tunnel is a project launched in haste, with grave implications for the health of the marine environment west of the Sydney Harbour Bridge and for the communities which live nearby.

As well as the profound threat the project poses to the marine environment, human health is at risk because of the many residents (including numerous families with young children) who rely on the harbour beaches and pools west of the bridge (such as Greenwich baths, Dawn Fraser baths) during the summer months. The Environment Impact Statement did not examine this at all.

The stirring up of highly toxic sediment off Berry's Bay and Yurulbin point during the tunnel's construction will set back decades' worth of work to restore the harbour to health, and risk making those local swimming spots a toxic stew.

The mooted destruction of Yurulbin Point, with its dozens of mature trees, is an act of wanton environmental destruction, seemingly only brought about by the project's designers being too penny-pinching to take the tunnel deep under the harbour bed. Instead they propose laying it across the harbour, in an indefensible corner-cutting and cost-cutting exercise.

The project looks largely driven by the need to "fatten the goose" before mooted sale of the government's remaining share of WestConnex, by trying to drive more car and truck traffic into the WestConnex system. Yet again budgetary resources that would be better directed at public transport are diverted into the business plans of a private toll company.

THREAT TO THE HARBOUR:

The Environmental Impact Statement relating to the project did its best to downplay the undisputed contamination risks posed by long-present toxins on the harbour bed, particularly in the once heavily industrialised areas of Birchgrove and Berry's Bay. References to the presence of toxins are fleeting despite the EIS being more than 250 pages long.

The project, as currently proposed, would see prefabricated sections of the proposed harbour crossing laid in a shallow trench across the harbour from Birchgrove to Waverton. Massive disturbance of marine contaminants (currently settled and impacted relatively safely on the sea-bed) would be an inevitable outcome of creating both the trench, and constructing the two so-called "coffer dams" from which all water has to be removed, to enable connection of the tunnel to the prefab crossing sections.

There is ample documentary evidence built up over the years of extensive contamination of harbour sediment. It has been a clear goal of successive state governments in the last 20 years or more, to restore the health of marine

ecosystems in the harbour, and to celebrate that achievement as both a tourist attraction and an amenity for all Sydney-siders to enjoy. To casually abandon that goal for a method of tunnel construction that is guaranteed to inflict maximum damage on the marine environment seems cavalier and inexplicable, and indefensible on public policy grounds.

A much safer alternative would be a tunnel BENEATH the sea bed. The claim that a below sea-bed tunnel is problematic because of some kind of insufficiency in the standstone has been put forward by the proponents, but nothing offered in the way of proof, leading to the suspicion that the EIS has been engineered so as to justify the cheapest construction method.

The EIS, in the relevant technical working paper, acknowledges that "The sediments pose a **high contamination risk to construction given that contamination is known to be present within sediments which are likely to be excavated and exposed during construction of the Sydney Harbour south cofferdam (WHT5) and Sydney Harbour north cofferdam (WHT6)**". Appendix M, table 4.2 lists "potential" (even that word is misleading; they are real, not potential) contaminants as including "Heavy metals, hydrocarbons (mainly Polycyclic aromatic hydrocarbons (PAH)), pesticides, PCB, dioxin, organotins, per- and poly- fluoroalkyl substances (PFAS)".

Dr William Ryall, a geochemist who has been accredited by the EPA as a site auditor on many projects involving contaminated soils and sediment, has analysed the EIS. He states that overall, **the EIS "does not provide any indication of the seriousness of the contamination in sediments in the Immersion Tube Tunnel Corridor or in White Bay."**

The cocktail of chemicals present include dioxins (human carcinogens often referred to as "gender benders"), heavy metals, especially mercury, which is toxic both to human health and the marine ecosystem, and TBT (tributyl tin) among others, TBT also being potentially toxic to the marine ecosystem.

Nowhere in the entire EIS is the potential impact on important public recreational assets such as the Dawn Fraser Pool, Elkington beach park, or Greenwich Baths, addressed. What will be the impact of contaminated marine sediment disturbance on these vital facilities? This is another major failing.

The EIS cites ANZECC guidelines which are 13 years out of date.

Eg. p. 56 of Appendix M talks about "*Sediment sampling was carried out within the proposed Sydney Harbour crossing and construction support sites at White Bay (WHT3) and Berrys Bay (WHT7) as part of the DGPA (December 2017a) investigation. Sediment samples were collected from a range of depths and analysed for contaminant compounds including heavy metals, TRH, BTEX, PAH, OCP, PCBs, per- and poly-fluoroalkyl substances (PFAS), dioxins, OPP, organotins, dioxins and furans, ASS, cyanide, nutrients, pyrethroids, chlorobenzenes, carbamates, phenols, herbicides, volatile chlorinated and halogenated hydrocarbons and radionuclides. The results of the laboratory analysis were compared against the following guideline criteria: o ANZECC (2000) High and Low Interim Sediment Quality Guidelines*

(ISQG)"

But those 2000 guidelines are completely out of date. Current guidelines, which are from 2013, should have been cited.

Appendix P of the EIS estimates the loss of 1300 cubic meters, at least, of fine-grained contaminated sediment into the waters around the construction site. There is no provision of any kind of EPA assessment of whether this is acceptable.

The suggested area of 1000 square meters at White Bay for treatment of proposed contaminated sediment is far too small for the purposes of dewatering and treating contaminated materials. Of course building the tunnel UNDER the harbour would address this problem and all the other problems outlined above.

The total proposed destruction of Yurulbin park is a tragedy. Again need for this would disappear completely if an alternate method or route for the tunnel was examined. In particular, two massive old figs on the left-hand side of the path leading to the ferry wharf are irreplaceable and are vital habitat for flying foxes and other native fauna. They have to be protected at all costs.

No convincing business case appears to have been made for the project. The northern beaches link and the tunnel are a poor way to invest scarce public resources which would be better invested in public transport. Northern Beaches has severe geographical constraints and is not going to become a site of major population growth in future.

This project should go back to the drawing board, but if not, the EIS should be withdrawn and its many deficiencies addressed. And the tunnel should go UNDER the seabed, not across it. Finally, proposed tunnel depths are also unacceptably shallow beneath Louisa Road and likely to cause not only severe noise and disruption but damage to the many houses along this fragile narrow peninsula.