

Submission
No 399

INQUIRY INTO IMPACT OF THE WESTERN HARBOUR TUNNEL AND BEACHES LINK

Organisation: Parramatta River Catchment Group

Date Received: 17 June 2021



LET'S MAKE OUR RIVER
SWIMMABLE AGAIN BY
2025

Parramatta River Catchment
Group
c/- City of Canada Bay
Locked Bag 1470
Drummoyne NSW 1470

Thursday, 17 June 2021

Upper House Parliamentary Enquiry Western Harbour Tunnel

The Parramatta River Catchment Group (PRCG) is an alliance of councils, government agencies and community groups. Together we are working to revitalise the Parramatta River and make it a safe and enjoyable place to swim. In October 2018, we launched [DUBA, BUDU, BARRA: Ten Steps to a Living River - The Parramatta River Masterplan](#). This Masterplan details the steps required to make the Parramatta River swimmable again by 2025.

The PRCG thank you for the opportunity to provide comment regarding the Western Harbour Tunnel and Warringah Freeway upgrade. This submission will focus mainly on the impacts of the Western Harbour Tunnel on Sydney Harbour, potential sediment contamination and water quality issues that may impact on the Parramatta River.

This proposal is of importance to the PRCG as it has the potential to directly impact water quality and marine biodiversity and impact our mission to make the Parramatta River swimmable again by 2025. In the short term, during tunnel excavation we are concerned about the lack of demonstrable monitoring and reporting on human health impacts at the existing swim site at Dawn Fraser Baths (Inner West Council).

In relation to assessing the EIS as critical state infrastructure the information provided in the EIS was not sufficient to ensure that we were able to understand and assess the impact of the project and proposed mitigation measures. Information related to the contamination of the sediment, detailed analysis on sediment dispersal modelling was not released with the EIS. Nor has information related to EPA licensing and ongoing monitoring been provided to ensure that aquatic and riparian biodiversity or the human health impact has been considered for our existing and proposed swim sites on the River.

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C/- City of Canada Bay

Locked Bag 1470, Drummoyne 1470

W ourlivingriver.com.au | E info@ourlivingriver.com.au | P (02) 9121 0009



INQUIRY TERMS OF REFERENCE

Most of the issues raised in this submission have relevance to the inquiry's terms of reference. Following is a brief account of how the issues relate to the terms:

(a) the adequacy of the business case for the project, including the cost benefits ratio,

Inner West Council (formerly Leichhardt Council) in 2016 commissioned the Westconnex Business Case Review an assessment by SGS Economics & Planning. It concludes that the project's business case is poor and WestConnex is not justified. As WHT is a motorway extension of WestConnex, the same conclusions can be applied to WHT.

(b) the adequacy of the consideration of alternative options

Inner West Council does not support the tunnel and motorway build in their LGA and would prefer a mix of options that includes public transport, active transport and travel demand management. Supported by transit-oriented development and some modest improvements of the existing road network. A new assessment is required in light of changed working methodologies associated with increased remote working capability supported by technology.

(c) the cost of the project, including the reasons for overruns

Sufficient data has not been provided publicly to determine the cost effectiveness of this project.

(d) the consideration of the governance and structure of the project including the use of a 'development partner' model.

Concern is raised from the PRCG after we requested detailed information on the project from Transport for NSW. A verbal presentation was provided to the PRCG Full Group meeting on 3rd June 2021. The TfNSW representatives noted that many issues we raised were yet to be resolved until contractors engaged, importantly around the exact methodology associated with dredging and disposal. Accordingly, we request greater involvement by NSW Government agencies in managing all major State Significant infrastructure projects.

(e) the extent to which the project is meeting the original goals of the project

The PRCG is of the view that that alternative transport options (mentioned above) would be more effective in achieving the transport/access goals that are sought to be achieved by the WHT. The relevance of this motorway should also be considered in light of NSW governments sustainability goals. I.e Net Zero targets.

(f) the consultation methods and effectiveness, both with affected communities and stakeholders

From experience with WestConnex, consultation methods and effectiveness fell well short of adequate in the earlier stages of the project. There have however been lessons learned by the State agencies, contractors and all involved that has led to noticeable improvements.



This is not to say that all consultation processes for WHT will be adequate. It also does not alter the fact that some residents in Inner West LGA will suffer considerable impacts even where consultation is adequate and compliance is achieved.

(g) the extent to which changes in population growth, work and travel patterns due to the Covid-19 pandemic have impacted on the original cost benefit ratio

These impacts are potentially significant, but more information is needed to answer the questions posed. We support the request for a NSW Government study on Covid-19 traffic/transport impacts to be assessed as part of this inquiry.

(h) whether the NSW Government should publish the base-case financial model and benefit cost ratio for the for the project and its component parts

Full economic disclosure would allow for an adequate assessment to compare the alternative transport options available.

(i) whether the project is subject to the appropriate levels of transparency and accountability that would be expected of a project delivered by a public sector body

In relation to WestConnex, Inner West Council raised concerns about the NSW Government's use of corporation structures and contractors to limit accountability and prevent disclosure of information. Accordingly we seek greater involvement by NSW Government agencies in managing major infrastructure projects.

(j) the impact on the environment, including marine ecosystems

We are concerned about the significant impact WHT would have on the harbour floor and the potential for contaminated dredged material to pollute harbour waters, and degrade aquatic environments. Even with compliance with environmental controls, there is always the potential for a spill or other unforeseen event that could lead to pollution, with serious results. The WHT would also affect terrestrial flora and fauna.

(k) the adequacy of processes for accessing and responding to noise, vibration and other impacts on residents, during construction and operationally

Night works, noise, traffic accumulation, vibration, construction impacts and 'rat running' on suburban streets have been the subject of residential complaints associated with the WestConnex, and similar issues associated with this project are likely to affect residents around Balmain and Yurulbin Point.

(l) the impact of the project on nearby public sites, including Yurulbin Point and Dawn Fraser Baths

In raising concerns about the potential for contaminated dredged material to pollute the harbour, we are also concerned about the effect on Dawn Fraser Baths, with implications for human health. There is uncertainty about how responsive monitoring will be during construction to ensure that public health is protected in the event of a spill or issues associated with dredging. As the impact on this swim facility was not assessed in the



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Reference Design or EIS, it should be assessed as part of this inquiry. It is important the monitoring and reporting is considered. Yurulbin Point will be profoundly affected by becoming a WHT construction site, and will not be available to the public during the construction phase. It is however acknowledged the park will be upgraded and re-opened to the public after construction.

The reduction of sediment laden stormwater runoff is critical to the PRCG mission to make Parramatta River swimmable again by 2025. The cumulative impact of significant roadway usage with this freeway has the potential to generate heavily polluted stormwater run-off through water collecting settled dust, settled micropollutants on the roadway and general litter that would then flow into the tunnel and into the water management system. Details of the level of treatment of this stormwater is not clear.

The WHT should consider the objectives of the [NSW Marine Estate Management Strategy 2018-2028](#). Improving water quality and delivering healthy coastal habitats are key objectives of this strategy. All current strategies and programs in both the Sydney Harbour and Parramatta River catchments are directed at improving water quality in our Iconic waterways.

The Parramatta River is core to the Central River City and the State Governments vision of Three Cities. With expected population growth and more development we acknowledge the need to construct further road infrastructure, however this should not be at the detriment of our natural and cultural heritage of our Harbour and waterways. Expansion of public transport infrastructure in our city should be the first step in providing sustainable, liveable cities in a changing climate.

This submission was drafted on behalf of our member councils and community and has been approved by the PRCG Executive team for submission. The PRCG are keen to remain involved and informed of this project, and for further information please contact me on

Regards,

Nell Graham

Coordinator Parramatta River Catchment Group

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W ourlivingriver.com.au | **E** info@ourlivingriver.com.au | **P** (02) 9121 0009