

Submission  
No 422

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

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## **Submission to Upper House Inquiry into the Western Harbour Tunnel**

As outlined in my submission to the EIS to this proposal, there are multiple grounds for objection. The five (5) most significant issues are as follows:

- The **unacceptable cumulative impacts of 4 unfiltered stacks on one single suburb** (Rozelle) from this project and the M4-M5 link.
- **Unacceptable negative health impacts from air pollution on the residents of Rozelle** and surrounding suburbs. This includes the fact that no consideration at all has been given to the resulting **PM5 particulates** (the most dangerous ones to human health).
- **Unacceptable air pollution, odour and health impacts** during construction from the treatment of toxic sludge at White Bay.
- **Major impacts on marine ecosystems** especially seagrass ecosystems, fish and crustaceans and other species further up the food chain including birds.
- **Unacceptable impacts** on historic **Yurulbin Point** (Aboriginal for 'fast flowing water') and the design award winning **Yurulbin Park** which will be demolished.

There are also **numerous other issues** including: the lack of consideration of greenhouse gas emissions generated by the project; the induced traffic it will create; the traffic impacts for the Balmain peninsula resulting from the Rozelle Interchange; the inappropriate use of immersed tube tunnel technology (which will generate a toxic sludge of heavy industrial pollution); the likely unfair outcomes for property affected residents and the flawed environmental assessment and community consultation process.

All of the above issues are detailed more fully in my submission to the EIS, however a summary of five main points (noted above) follows.

### **1. Unacceptable cumulative impacts of 4 unfiltered stacks on one single suburb (Rozelle) from this project and the M4-M5 link.**

It is unacceptable to have four (4) unfiltered traffic pollution stacks within 1 km within a single suburb whose area is just under 2 square kilometres. Moreover, one of these major stacks (the one bringing air pollution from the length of the western harbour tunnel all the way from Waverton) will be adjacent to Rozelle Public School and within metres of a second school (Sydney Secondary College). The **cumulative impacts** of these blended road projects one single suburb have not even had a mention, let alone any serious consideration in the EIS for the tunnel project. The planning and approval process for these two projects has been appalling for a developed country in this day and age.

## **2. Unacceptable adverse health impacts from air pollution on residents of Rozelle and surrounding suburbs.**

How can the EIS recognize that the health of local residents near the portals and emission stacks (eg at Rozelle) will be impacted but suggest that overall, the health impact of Sydneysiders in general, will be acceptable? Is planning no less than four (4) unfiltered traffic pollution stacks in different parts of one suburb to be seriously considered in line with 'high air quality standards'? In this project, a harbour tunnel is proposed to join up with an already massively long road tunnel. All the emissions from traffic in these tunnels extending from Ashfield to Waverton are pumped out into the atmosphere at the (unfortunately located) suburb of Rozelle. Consequently, the claims of high air quality standards being adhered to, are laughable.

The measuring and modelling of road tunnel smoke stacks in the EIS only includes consideration of carbon monoxide, nitrogen oxide and PM 10 particles. **There is no consideration of PM 5 particulates pollution and related health impacts on nearby residents and children attending adjacent schools.** Moreover, impacts to local residents are noted and deemed to be 'acceptable' as most other Sydneysiders will have reasonable air quality. How is dismissing the impacts on adjacent residents and school students and not including any analysis of PM 5 particles (the ultra-fine particles which are the most dangerous to human health that can lodge inside human lung cells) considered acceptable?

## **3. Unacceptable and continued odour, air pollution, and health impacts on White Bay Residents from proposed treatment of toxic sludge**

Once again, along with cruise ship pollution, proposals for concrete batching plants and more, this proposal involves further significant impacts on air quality, breathing and health for the long-suffering residents who live next to White Bay. This is a densely developed residential area characterized by a mix of dwellings including multiple apartment buildings, townhouses and terrace houses. The EIS describes a number of properties as affected - neglecting to note that many so called 'properties' are actually multi-dwelling buildings each containing hundreds of people.

The proposal includes **bringing 142,500 cubic metres of contaminated sediment over to White Bay** by barge for 'processing' right next to this medium density housing. **This sludge will contain dioxins, tributyltin and heavy metals and will be so toxic that it cannot be disposed offshore or covered and transported for immediate land disposal upon extraction.** Yet the EIS claims it is quite appropriate to 'process it' immediately adjacent to residents in White Bay. Odour impacts are noted and inadequately addressed in the EIS. **Processing toxic sludge** that contains carcinogenic elements from some of the most heavily polluted industrial sites that operated in Balmain, Birchgrove and Cockatoo Island for over a century **is not acceptable when this occurs next to a residential area.** This kind of work has nothing to do with 'a working harbour' and is unacceptable in the short term and certainly unacceptable for an expected three years or more.

## **4. Major impacts on marine ecosystems**

There are significant impacts on disturbing the toxic sludge accumulated over a century on plant life, fish, crustaceans and other species further up the food chain including birds that are basically omitted from the EIS discussion of impacts on marine species. The EIS states: 'most of the project footprint is considered to be in poor ecological condition, with little ecological value and unlikely to have any native resilience of recovery potential'.

However, Australian Museum records since 1850 indicate that Sydney Harbour is biologically diverse with over 2,474 species of polychaetes, crustaceans, molluscs and echinoderms recorded. 70 threatened species including fragile sea grasses supporting endangered sea horse and dragons are at risk from the toxic plumes that will result from dredging contaminated sediment from the harbour floor. The measures described to reduce this impact (eg curtains) are not adequate. More importantly, details about concentrations of dioxins, tributyltin, polynuclear aromatic hydrocarbons and heavy metals are not noted in the EIS - apparently (and inappropriately) due to 'Commercial in Confidence' claims. There should never be commercial considerations claimed for an environmental impact report on a public (or private) project. Accordingly, the environmental assessment (and the ability of experts and the public to analyse it) is simply inadequate in this area.

#### **5. Unacceptable impacts on Yurulbin Point and Yurulbin Park**

Long Nose Point was renamed Yurulbin Point in 1994 to reflect its status as a 'place of fast flowing water' - hardly the best location for careful removal of toxic sludge. In this proposal, the design award winning Yurulbin Park will be demolished. The EIS notes that Yurulbin Park is a locally significant heritage item and the 'level of impact on the heritage item overall would be major'. It also notes that, 'permanent impacts would occur to areas of archaeological potential'. Given that the Balmain peninsula has important heritage significance for the state and the country, how is it acceptable to simply note this - and destroy it anyway?

#### **Final Note:**

In summary, there has been no adequate assessment of the health impacts of those living near the proposed stacks at Rozelle and those living near the proposed sludge 'processing' site at White Bay. In the absence of necessary details about the actual contaminants in the sediment that will be disturbed in large quantities, the impacts on marine life in Sydney Harbour have been dismissed in this EIA. Also, there is no consideration at all of the **cumulative impacts** of the two conjoined projects (Harbour Tunnel and M4-M5 link) on the suburb of Rozelle.

Moreover, to claim that information about the toxicity of the sludge to be excavated from the harbor adjacent to sites that have been subject to heavy industrial pollution for well over a century is 'Commercial in Confidence,' shows no concern for environmental or health impacts and means proper critical analysis of this project by expert toxicologists and contamination experts has to-date been rendered impossible.

The strong message from this government as a result of its multiple (outdated) road-based projects including the Western Sydney Harbour Tunnel is that the health and the environment of the community that lives around Rozelle, White Bay, Balmain, Birchgrove and Lilyfield simply do not matter. I thank the Inquiry for looking into the impacts and the questionable legitimacy of this project, its poor assessment process, and its approval, particularly without important modifying conditions to reduce its numerous and unacceptable impacts. Appropriate recommendations should include requiring proper filtration of air pollution stacks, ensuring appropriate tunnel construction methods that do not disturb highly polluted sludge and certainly not treating such toxic sludge adjacent to existing residents. Nothing short of stopping the project or relocation of the tunnel away from Yurulbin Point will reduce the impacts to that important site. Thank you for considering these points.

**Helen Gilbert**

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