

Attention: Director, Transport Assessments
Objection to Western Harbour Tunnel and Warringah Freeway Upgrade (Project ID: SSI 8863)

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Declaration: I have made no reportable political donations in the past 2 years

30 March 2020

Dear Director, Transport Assessments,

I wish to register my opposition to the Western Harbour Tunnel (WHT) and Warringah Freeway Upgrade project. My objection is threefold: 1) concern for human and environmental health; 2) projects strengthening Sydney's public transport network should be prioritised for public funds over those which cater primarily to private vehicles; and 3) WHT reports are written in an inaccessible manner and with a lack of transparency.

1) Concern for human and environmental health

Many people swim and fish recreationally in Birchgrove waters, including young children and teenagers, local residents and non-residents who visit Birchgrove to fish and relax (Figure 1). From speaking to some of these recreational fishers, it is evident that some collect their catch without regard for fish species or safe/ legal consumption guidelines. Thus, any elevation in contaminant levels arising from disturbed sediments during WHT construction is of serious concern to human health.



Figure 1: Popular fishing spots in Birchgrove include Snail's Bay Jetty, Yurulbin Park and Ballast Point Park (pictured here).

Furthermore, the positive impacts of improving water quality on the inner harbour ecosystem have become evident in recent years. Anecdotally, over the last two-to-three years sightings of sea eagles over Birchgrove are not uncommon, where previously they were not seen. I take sightings of apex predators in the inner harbour as a positive sign for the improving health of the local ecosystem. I am concerned that disturbing toxic sediments in the process of the WHT construction, which have the potential to react with each other and amplify negative impacts, will set us back years in terms of water quality and ecosystem health. This in turn may have knock-on effects to human health or restrict recreational activities which the public can feel safe partaking in in the Birchgrove area.

2) Projects focusing on improving Sydney's public transport network should be prioritised over those which cater primarily to private traffic.

It is clear that as Sydney's population grows and as we approach a tipping point in global carbon emissions that Sydney must place far greater emphasis on public transport, providing incentives for taking public transport and disincentives for driving private vehicles. The WHT will be more heavily used by private than public traffic and thus is not the project most deserving of public funds. Each day I commute 1.25 hours to get from Birchgrove to my workplace in Parramatta, a commute which would be reduced to 35 minutes when driving via WestConnex, a project which I note did nothing to improve public transport options. Instead of building new roads which confer more benefit to private than public traffic, I suggest investing in improving public transport options for Sydney residents: strengthening the rail network by adding additional lines, allocating more bus lanes throughout and between our Sydney CBDs, increasing ferry services and providing safe cycle lanes. I note that some of these alternatives are reviewed in 4.3.5; however I remain unconvinced of the merit of this project over other options with a stronger focus on improving Sydney's public transport services.

3) The report is written in an inaccessible manner and lacks transparency

The WHT EIA is written in an unnecessarily lengthy and inaccessible manner, which seems likely to disempower many people from reading and understanding the project and its potential implications for human and environmental health. As an example of the report's lack of transparency I would cite the difficulty of finding detail on heavy metal contamination. The main chapter (*Ch 17: Hydrodynamics and water quality*) refers only to 'High levels of heavy metals' in general

and does not specify specific contaminants or contaminated sites. Instead this information is relegated to the final pages of *Appendix M*, and even here locations are provided as codes and contaminant levels as 'high' or 'low' (Figure 2). No key is provided to indicate exactly what level 'high' and 'low' is for different contaminants.

In summary, given the potential risks to human and environmental health, the fact that the project confers greater benefit to private than public traffic, and noting that the EIA written in a manner which may disempower members of the public from accessing important information, I object to Western Harbour Tunnel and Warringah Freeway Upgrade project.

Table B.1 Contaminant compounds exceeding the nominated criteria at sediment sample locations

Location	Compound	ISGC (high)	ISGC (low)	NAGD	NEPM EIL
WHT					
B108WA_VC-A	PAH		x		
B111WA_VC-A	TBT		x	x	
	Heavy Metals		x		x
	Mercury	x			
	Lead	x			
	Silver	x			
	Zinc	x			x
B111W_VC-B	PAH		x		
	TBT		x		
	Heavy Metals		x		x
	Mercury	x			
	Lead	x			
	Zinc	x			x
B111W_VC-C	PAH		x		
	Heavy Metals		x		x
	Mercury	x			
	Lead	x			

Figure 2: Screenshot of Table B.1, *Appendix M* p. 132.