M4-M5 Link Mainline tunnel modification proposal

Submission from Anne Picot

I write to object to the proposed relocation of the water treatment plant from the Darley Street end of the M4-M5 Link project, Stage 1 to St Peters. Despite the volume of tables and pages of assessment there is so little detail about the water treatment plant itself and how it is to fit into the St Peters Interchange (SPI) that it begs the question, has this been considered properly.

It is not clear to me if this treatment plant is the principal or indeed the only water treatment plant for the very long tunnels between Haberfield and the SPI. This is not stated as far as I can see in the modification. If it is intended to be the only water treatment plant for managing the drainage run off from these very long tunnels, then this constitutes a substantial addition to the infrastructure of the SPI.

The modification report discusses this as if it were a simple matter with few consequences, yet the terrain is quite different because the land west of the Alexandria canal is low-lying and much of it reclaimed swamp with significant flooding, drainage and contamination issues.

Drainage from the SPI has already been a source of controversy because – as the residents had feared and had notified the proponents in response to the new M5 EIS – the leachate from the former landfill site was likely to be contaminated. For months the stench from the untreated leachate was a source of considerable distress and harm to the neighbourhood, and is the subject of court action by the EPA.

The planning and management of the risks of flooding as proposed in the new M5 EIS likewise was subject to debate and many objections, because both residents and experts disputed its adequacy. The far heavier rain storms we now experience in the neighbourhood have caused multiple instances of flash flooding from storm water run-off primarily in Campbell St and the Princes Highway in the past two years. This was not anticipated by the new M5 EIS which paid little attention to climate change when assessing flood risks. It took repeated questions, complaints and representations to the new M5 staff to get them to take the flooding issues in Campbell St seriously before the principal engineer for the Campbell St works admitted that it was a complicated problem. This resulted in the modification of the design to include large storage tanks under the re-aligned street (between Florence and Brown Streets) west of the Princes Highway. It remains to be seen how well this deals with flash flooding in this stretch of the road works, given the greater expanse of hard surfaces and the greater height of the road surfaces.

I raise this, not because the water treatment plat's discharge is likely to affect the west Campbell St flooding and drainage issues but to illustrate that the drainage and flooding risks in our neighbourhood are not simple matters and require more than bland re-assurances that it is been modelled and tested.

The proponent does not yet know how they will dispose of the water. Three options are provided but it is also stated that a combination of these options is possible. The proponent should be required to at least do enough work to know what option will be used. There is not even enough information for stakeholders to know what the advantages and disadvantages could be for each option.

We are told:

> "Runoff generated from the operational water treatment site will either be discharged to the St Peters interchange stormwater management system being constructed as part of the New M5 project or directly to the local drainage system." (p.6-89)

The design of the new M5 SPI stormwater management system did not include provision for the water treatment plant's drainage or run off for the stage 3 M4-M5 Link. While the volumes are not large it is assumed that this refers to normal operations.

Questions:

Does this take into account out of the ordinary situations including heavy rain storms and flooding, fires or major accidents in the tunnels?

Will the proponents modify the competed SPI stormwater management system to ensure the additional treated waste water can be adequately managed?

The location and size of the SPI storm water basin shown in Figure 6.14 is different from the model[1] we residents of St Peters are familiar with, but in the absence of construction plans for the interchange site we cannot tell if the difference is significant. The only other "design" concerning the SPI part of the modification, shown in Figure 6.15, does not refer to the water treatment plant at al. We do not know what the height of the SPI storm water basin is vis-a-vis Burrows Road or the surrounding area. It is impossible to assess if using the new M5 storm water drainage system is reasonable or not.

Discharged waste water MUST be treated to the maximum standard so it does not add to the already contaminated Alexandria Canal as proposed for both options 1 and 2. The canal is already subject to an EPA remediation order so it is almost unbelievable that this modification should contemplate adding further contaminants. As was brought to the attention of the proponents in response to the second and third EISs for this project, it is not acceptable to argue that if waterways are already contaminated then adding to the contaminants doesn't matter.

While the average volume as stated (average of around 23 litres per second) may not affect the existing contaminated sediment in the canal, there is no reference to extraordinary events. There is no explanation as to how the average of average volume of 23 litres per second was estimated. Until the treated discharged water is cleared of the identified contaminants, especially heavy metals, discharge into the canal is not acceptable.

The third option – "Wastewater would be discharged to Sydney Water's sewage system in accordance with a Trade Waste Agreement" – requires consultation with Sydney Water, which is otherwise not referred to in this discussion. This seems quite extraordinary.

Question:

Why cannot the wastewater be treated to recycled water use standards?

The proposal to relocate the water treatment plant should not be approved without detailed plans for all options, public input from Sydney Water and the EPA, further, public assessment and therefore some certainty about the impact.

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[1] See photo of model over page.


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