

Attention: Director – Transport Assessments

## **Submission relating to Western Harbour Tunnel Environmental Impact Statement**

Name: Peter Symonds

Address: 22 Grove St, Birchgrove [not for publication]

Western Harbour Tunnel and Warringah Freeway Upgrade

Environmental Impact Statement: project 1045

Application No: SSI 8863

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

Date: 25 March 2020

### **Objection**

#### **Objections to methods proposed for dredging for the proposed Immersed Tube Tunnel**

I am very concerned by and object to the methods proposed for dredging and extracting contaminated sludge for the immersed tube tunnel. The method proposed will inevitably result in serious pollution to the waters of Sydney Harbour. Damage to marine life would be very serious with beaches and harbour pools in the vicinity unsafe to use for extended periods

Many years of hard work have gone into cleaning up our harbour. It would be unforgivable to reverse this in any way.

My concerns arise from, amongst other things, the use of short curtains to contain sediment during the excavation. These cannot contain the toxic plume inevitably created and likely result in far more pollution than the substantial amount already indicated in the EIS.

If the proposed method of sediment removal were to go ahead, full depth curtains anchored to the seabed would be a far safer method. I recognise that currents are high in this narrow part of the harbour. If that is an issue then shorter sections across the harbour could be used presenting the same surface area to the current.

Alternative methods for underwater stabilising the sediments before excavation should be considered to minimise the toxic plume and hydrogen sulphide gas when the sludge is exposed to the atmosphere.

A very large quantity of contaminated sludge is to be removed. The size of the treatment site at White Bay at 1000m<sup>2</sup> seems quite small for the quantities involved. The treatment of toxic sludge must be effective and prompt to minimise noise and odours for the residents of Rozelle and Jackson landing, while meeting all EPA and other requirements.

Damage to the harbour is a central risk to the project.

Enquiries from the public asking for the composition of the toxic sludge planned to be excavated for the immersed tube tunnel have been refused on the basis of being commercial in confidence.

Without this data the impacts and risks associated with dredging cannot be fully assessed.

In this regard the EIS does not meet the SEARs requirements for transparency under Sears Desired Performance Outcome Item 1. *Environmental Impact Assessment Process*

and the requirements of Desired Performance Outcome Item 2 *Environmental Impact Statement*.

The data should be released.

### **Objection to the method proposed for noise control measures at the Yurulbin Point construction site**

The diagram on page 48 of Your guide to the EIS Western Harbour Tunnel and Warringah Freeway Upgrade indicates temporary noise barrier locations. My home is located about 400m SSW of the Yurulbin Point site. There are no noise barriers between the site and my home (and many other adjacent properties)

The EIS should include requirements that noise barriers completely surround all worksites – particularly noisy work sites likely to work extended hours.

### **Objection to the current Zone of Influence**

The Zone of Influence is currently set at an apparently arbitrary 50m beyond the tunnel edges. This is clearly inadequate as shown by the satellite imagery produced by Otus Intelligence Group. The Zone of Influence should be extended to the more realistic 350m.

Perhaps the Zone of Influence should not be determined by distance from the tunnel. The true test of the Zone of Influence is determined by property being affected or damaged by the tunnelling.

The responsibility for reinstating that property then lies with the contractor or the

State Government irrespective of the distance from the tunnelling.

## **EPA**

The entire Western Harbour Tunnel project must meet all EPA requirements.

## **Major non compliance with the SEARs**

The EIS does not meet the requirements of the SEARs Item 2.1.e - *an analysis of any feasible alternatives to the project.*

No alternatives were put forward.

Without this analysis and in the absence of a publicly available business case the Western Harbour Tunnel and Northern Beaches Link should not go ahead and the EIS rejected.

## **Community Benefit**

If the Western Harbour Tunnel is intended to be a benefit to the community as a whole it should provide benefit at every level and at every stage including - careful planning and design, appropriate land acquisition and fair compensation, use of construction methods that minimise impacts on the community and the environment and reinstatement of all properties impacted upon or damaged by the project's activities.

Failure to effectively manage environmental impacts such as exhaust stack emissions, harbour sludge dredging, noise, dust, and other factors such as damage to property, traffic and parking creates real hidden costs.

If the project is completed with benefit to the community as a whole as suggested it may appear to increase costs. Failure to use this approach however passes the hidden costs on to the community directly and indirectly, short term and long term. In fact the true cost may be much higher.

Peter Symonds