

Opening Remarks

Physical and environmental conditions

The Technical Reports

1. In preparing the Environment Effects Statement, the WDA has undertaken extensive work in order to:
 - a. Characterise the existing environment in which the Project will be constructed; and
 - b. Identify potential effects as a result of the Project.
2. The Environment Effects Statement includes the following relevant technical reports ('the Reports'):
 - a. Technical Report B – Contaminated soil and spoil management
 - b. Technical Report C – Groundwater
 - c. Technical Report D – Ground movement
 - d. Technical Report E – Surface water
 - e. Technical Report F – Ecology
 - f. Technical Report I – Vibration and regenerated noise (tunnel)
3. The issues of air quality, surface noise and vibration and human health impacts will be address separately following the evidence on traffic impacts. This is because the evidence in those matters follows logically from the traffic modelling.
4. Preparation of the Reports involved extensive fieldwork in addition to a desktop review of existing material. For example, 115 monitoring wells were sunk as part of investigating the groundwater system in the area. At least in respect of the investigations relevant to his fields of expertise, Mr Hancock has characterised these investigations, variously, as 'rigorous', 'extensive', and 'comprehensive'.
5. The Reports also benefitted from input from, and review by, the Technical Reference Group for the Project. The TRG included representatives from local councils, the Department for Environment, Land, Water and Planning, the Department for Health and Human Services and the Environment Protection Authority.
6. The authors of each of these Reports has provided an expert witness statement to the Committee. Apart from those statements, there is no other evidence before the Committee regarding these matters. While the EPA was given an opportunity to attend expert conclaves on groundwater and contaminated land, it advised that it did not think it was necessary to do so.
7. In these circumstances, it is submitted that the Committee can and should accept the evidence of the Authority's witnesses as accurately characterising the existing environment and correctly identifying the likely effects of the Project.

Environmental Performance Requirements

8. The Reports include specific Environmental Performance Requirements ('EPR') aimed at addressing the specific risks raised by the Project. Many of these are directed to the resolution of uncertainties about the precise nature of the environment.
9. As part of their review of submissions and their consideration of the Committee's Request for Further Information, the authors of the Reports were asked to provide further feedback. WDA has responded to these in a further draft version of the EPR (Version 1).

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