

14 Kingston St

Haberfield

NSW 2045

2nd November, 2015

Westconnex M4 East Tunnel (SSI 6307)

NSW Department of Planning and Environment

GPO Box 39, Sydney, NSW 2001

To Whom It May Concern,

RE: Response to WestConnex EIS

I make the following submission to the Environmental Impact Statement exhibition for the WestConnex M4 East Tunnel Project (SSI6307).

I am opposed to the construction of the WestConnex project, and in particular the spending of \$15.4bn of taxpayers' money on this project without significant measureable return on investment. The business case for this project needs to be released to the public. The EIS claims a travel time saving of 6 minutes for people using the tunnel.... but then dumps them into already congested roads. There has been inadequate consideration for alternative solutions to address Sydney's traffic problems, such as public, pedestrian and cycling transport solutions, and the EIS fails to consider less destructive tunnel or road solutions, or outline the clear reasons why the 'long tunnel' option was discounted. There has been as well no consideration of the impact on traffic of investing a similar amount of money to create infrastructure and jobs in the West of Sydney rather than trying to have people living in the west move to the CBD for work. There is inadequate consideration for the devastating impact this project has on the lives of people living in the communities of Haberfield and Ashfield, and the destruction of heritage items. Page v of Vol-1A of the EIS states "minimising cumulative impacts on the local community". Clearly whoever wrote this does not have any concept of the impact on the local community.

I have spent many hours in recent weeks reading the EIS in order to understand the justification and ramifications of this project, and this has led me to raise the following concerns.

Impact on Haberfield Public School (HPS) and broader Haberfield Community

I have two children, one who already attends HPS, and another who will commence kindergarten in 2016. HPS is a wonderful school, with dedicated teaching and support staff and a wonderful community feeling. We enjoy the feeling of community at our local school and the local area and are very concerned about the loss of community due to the destruction of local property, and the impact on our children's health and learning environment with the proposed construction.

I object to the construction of unfiltered ventilation stacks less than 500m from Haberfield Public School. It is appalling that in the 21st Century, the NSW Government believes it is acceptable to build a tunnel without filtration. Mike Baird and Duncan Gay would not want this on their own doorstep, so why do we have to. Recent tunnels which have been constructed in Madrid and Tokyo have installed such filtration systems, and even a report from the RTA itself in February 2004

“Electrostatic precipitators and ventilation in road tunnels in Japan” recommends that the RTA should investigate the use of Electrostatic Precipitators in Sydney tunnels. (www.rag.org.au/tunnel/graphics/japan_road_tunnel_ventilation.pdf accessed 28/10/15). The EIS does not include an independent assessment of the benefits of filtration, or other pollution reduction measures, it simply seems to discount this option at all.

The EIS does not take into consideration the full extent of the pollutants that are generated from cars, including heavy metals, odours, and other noxious gases, and does not consider the adverse health impacts of these pollutants. It also does not consider the long term exposure to pollutants, it seems to refer to 15 minute or 1 hour exposure intervals (not peak exposure levels). For children who are attending HPS for at least 6 and often up to 8 hours a day, at an elevated receptor location, they will be exposed to this in far greater concentrations. Children are also more sensitive to breathing in these pollutants into their growing bodies and lungs.

In the WestConnex briefing at HPS on 12th October, one employee from the WDA claimed it was more cost effective to build cars which pollute less than to install tunnel filtration, and with the recent exposure of VW's dodgy practices, this is an unbelievable assertion. What the EIS has not considered is the total cost of health impacts on the community who will experience additional pollution effects from the unventilated emissions stack. The increased incidence of Asthma, heart and lung issues are well known and identified in the medical literature available. What is the cost of additional medicare expenditure, hospital admissions, lost work days due to the adverse health impacts of this pollution. This must be considered for a proper business case to be justified.

In the EIS there has also been inadequate assessment and dispersion modelling of the tunnel ventilation pollution and the impact on the broader local community. As our children go to school and live within 1km of the proposed stack, they will be subject to these toxins up to 24 hours a day, 7 days a week. I am very concerned about the cumulative health impacts caused by their exposure to this pollution.

There has also been no explanation in the EIS as to why the height of the ventilation stacks at Haberfield will be only 25m instead of 30.5m which is proposed at the western end of the WestConnex. Surely a higher tower will better disperse the pollutants. The proposed location for the tower is also not at the highest point in the area, so it's unclear why this location was selected.

I find it shocking that the EIS does not provide any data collected in a professional manner of the impact of the building of a tunnel on the health of residents living near a tunnel inlet or smokestack. I strongly object to the omission of this information as I see this as being an essential part of a project EIS. It shocks me further as well that statements are made by representatives of the WestConnex Delivery Authority at information sessions that the use of filtration is un-economical. This suggests that the WestConnex Delivery Authority and their EIS team accept that there is an undeniable negative impact to the residents living nearby a tunnel inlet or smoke stack (though they refuse to quantify this in the EIS) but that it is more important to save money (an amount that, in the scheme of things in this project, would be small) rather than to minimise the impact on health of the residents in the immediate neighbourhood of a smoke stack or tunnel inlet. The EIS report is very unsatisfactory when it comes to explaining why it is justified in not introducing filtration (thus actively harming the health of residents) while it seems to be an accepted practise in other countries to use filtration. In fact, the EIS does not justify at all why filtration would not make sense in this particular case.

I note with interest Page 64 of Appendix M which indicates that an “Air quality monitor at the school before construction.” And I look forward to seeing the results of the measurements before, during and after construction. I would appreciate if the Westconnex Delivery Authority would make this data available on line immediately.

In order to minimise impact on our children’s health and learning environment, I request that if this project is to proceed:

- Filtration put into tunnel stack
- Immediate installation of the air quality monitoring at HPS
- Noise abatement measures at the school, including insulation and installation of double-glazed windows, and air conditioning with particulate filters
- No construction traffic to use Bland St or Denman Ave, and no parking in the area around the school to be used by construction workers.

Anomalies and inaccuracies in the report

In reviewing the EIS, I have noted the following anomalies and inaccuracies:

- The anticipated operational power requirements of the two ventilation stacks appear incorrect. Vol 1A page 5-56 – Table 5.5 shows the Western ventilation facility requiring 10,700 MW/year, whereas the Eastern ventilation requires only 4,525 MW/year. Seeing as the Eastern facility is much larger, then this must be incorrect.
- Section 5.3.3 on Page 55 of Appendix M does not acknowledge that there is before, after school and vacation care facilities at Haberfield Public School. Similarly, Table C4 in Appendix C to Appendix M
- The projected traffic figures also do not take into account recently announced initiatives from Asciano (<http://www.smh.com.au/business/asciano-spends-100m-on-expanding-sydney-freight-hub-network-20151008-gk44qp.html> accessed 28/10/15) who will be building a freight transit facility in Western Sydney, connecting to Port Botany by Rail. This would reduce the number of heavy transport vehicles who would use the WestConnex and require transport to Port Botany.

I do hope you consider my concerns and issues with this fundamentally flawed project. I cannot agree with Mike Baird’s comments that we have to give a little for the greater good of Sydney. The Greater good of Sydney is better off with a significant investment in area’s away from the CBD to create jobs in the West and South of Sydney. This is the only way to decongest traffic on roads towards the CBD.

I appreciate a written response to the points I raised in this submission.

Yours Sincerely,

Dirk Notelaers