

Submission to the Department of Planning and Environment

for the

NorthConnex Project**Application No: SSI 13_6136**

from the

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BACKGROUND

The West Pennant Hills Valley Progress Association (WPHVPA) represents about 3,500 households and some 10,000 residents located in the area bounded by Castle Hill Rd in the north, Pennant Hills Rd in the east, the M2 & Darling Mills Creek in the south and Excelsior Creek in the west. The **NorthConnex** project lies along the eastern and southern boundaries of our area. The Association has been in existence for more than 20 years and holds regular meetings to discuss local issues. In this regard local residents have been given the opportunity to come forward with their views on the EIS and concerns about **NorthConnex**.

SUMMARY OF CONCERNS

Local residents' concerns about the EIS are summarised as follows and form the basis for our submission:

- 1 Failure to heed the findings of Pearlman Inquiry
- 2 Inefficient and inequitable location of southern stack
- 3 Air quality: limitations of plume dispersal modelling and lack of filtration
- 4 No commitment to monitor external air quality after first 12 months of operation
- 5 Unsatisfactory heavy vehicle route during construction
- 6 Excessive noise along M2 from integration works
- 7 Environmental damage to Blue Gum Creek
- 8 Lack of direct connection from southbound tunnel to M2 east
- 9 Impact on local roads following tunnel completion

In general terms there is a broad sense among the local community that Transurban are cutting corners to reduce costs. This is why the majority of issues above, including air quality, location of southern stack, noise along the M2 and damage to Blue Gum Creek, have become contentious rather than being non-issues if properly addressed. In addition, our members believe that this proposal is being rushed through and, as a consequence, the EIS contains serious omissions and inconsistencies.

CONSIDERATIONS

1 Failure to Heed the Findings of Pearlman Inquiry

It is disappointing that despite the recommendations of Justice Mahla Pearlman's Inquiry in 2007 which indicated that the best long term solution for reducing truck volumes on Pennant Hills Rd was a new western route involving a second Hawkesbury River crossing, the community is now being offered the inferior **NorthConnex** proposal instead. Unfortunately it is clear that while **NorthConnex** is not the best road solution, it is the best commercial option for Transurban. The reality is that **NorthConnex** will not

provide a long term solution to Sydney's motoring public, but will only provide short term 4/5-year relief before congestion sets in once again.

The WPHVPA urges that the Department of Planning & Environment (DPE) continue with planning for the route favoured by Justice Pearlman and take the necessary steps to protect the corridor, regardless of whether the **NorthConnex** proposal is approved or not.

2 Inefficient and Inequitable Location of Southern Stack

West Pennant Hills Valley (WPHV) will suffer more than any other area from the impacts of this proposal. The noise and visual impact of the motorway control centre, the noise and potential odours from the water treatment plant, noise from the maintenance facility and additional noise from the M2 integration will all be ongoing 24/7 once the motorway is in operation. In contrast, suburbs further north along the corridor such as Pennant Hills and Thornleigh will benefit from the project due to improved air quality and reduced traffic on Pennant Hills Road. The tunnel support facilities in these suburbs will only be used in emergency situations.

Our burden is further increased by Transurban choosing to locate the southern stack in WPHV simply because RMS already owns land there, thus making it a cheaper option. There are many places in the EIS (eg page 61) where it is stated that the best location for a ventilation outlet is directly above the main alignment tunnel because this maximises the operational efficiency and eliminates the need to construct additional shafts and tunnels between the main alignment tunnel and the ventilation facility. This means the best location for the southern stack is directly above the main alignment tunnel on the Pennant Hills Golf Course side of the road and not in WPHV. Relocating the stack to its most efficient location would also move it further away from residential areas. Although Transurban may argue it may not do much to improve air quality in WPHV, the social impact would be huge and it would go some way to restoring equity to this project.

(We also note that the EIS completely omits details of the additional fans, shaft and tunnel that would be required to connect the main alignment tunnel to Transurban's proposed southern vent location in WPHV. This means that those elements are not open to public scrutiny.)

The WPHVPA requests the DPE to oblige Transurban to locate the southern ventilation stack directly above the main alignment tunnel on the Pennant Hills Golf Course side of Pennant Hills Road.

3 Air Quality: Limitations of Plume Dispersal Modelling and Lack of Filtration

Transurban predict that emissions from the ventilation stacks will have a negligible impact on our air quality, but the reliability of results from the plume dispersal model is in doubt. The limitations of the model are discussed in Appendix G of the EIS where it is acknowledged that days of low wind speed, and emissions that are non-buoyant, are 'problematic' for the model. Table 8.36 of the EIS states that on very hot days (over 35°C) the **NorthConnex** tunnel environment "is expected to maintain a cooler environment compared with surface temperatures". This implies that emissions on such days could have negative buoyancy, leading to unreliable results.

In addition, temperature data from the Lane Cove Tunnel have been used in the model, and although the data have been adjusted to the new location, the emission temperatures do not appear to have been adjusted for the different conditions in the **NorthConnex** tunnel. The proposed tunnel is much deeper than the Lane Cove Tunnel and will be cooled by a considerable flow of groundwater, which may influence emission buoyancy. The limitations of the model, together with the use of inappropriate data, suggest that the results obtained may be unreliable.

Our local community is potentially seriously affected by air pollution resulting from tunnel emissions from the southern ventilation outlet. Yet on reading the EIS, few in the community are satisfied with how the air quality issues have been addressed. The lack of filtration for twin 9km tunnels is argued as not being “cost effective”. It is unacceptable that in a modern city like Sydney, people’s health is being potentially prejudiced because of costs.

The WPHVPA requests the DPE to oblige Transurban to implement the ‘best’ not ‘cheapest’ technology for the air ventilation outlet. In addition, if filtration is not used from the outset, provisions must be made in the design and construction of the tunnel and ventilation stacks for future retrofitting of pollution control systems should the need arise.

4 No Commitment to Monitor External Air Quality After First 12 Months of Operation

During operation, in-tunnel air quality will be monitored continuously, but it is proposed that external air quality will only be monitored for the first 12 months. Air quality around the stack location will depend on the appropriate use of fans installed in the tunnel ventilation outlets. These fans are expensive to operate and this may create an incentive for Transurban to cut costs by operating fans at a lower than desirable speed. It is therefore essential that external air quality in the vicinity of the stacks is monitored by an independent source throughout the life of the project. The results must be made publicly available.

The WPHVPA requests the DPE to require independent monitoring of external air quality in the vicinity of the stacks, throughout the lifetime of the project, with the results made publicly available. If air quality goals are not met, Transurban must be obliged to improve traffic management or tunnel ventilation, and/or to install pollution control systems.

5 Unsatisfactory Heavy Vehicle Route during Construction

Heavy vehicle movements to and from the southern worksite must only be permitted to and from Pennant Hills Rd. The proposed heavy vehicle route through 2km of the local street network (Aiken, Oakes, Karloon, Eaton) is a suggestion that should be dismissed out of hand. The idea that narrow local roads with 3 tonne limits should carry some 1500 heavy vehicles per day for 3 years shows the lack of serious effort by Transurban to solve this issue. It is an insult to local residents that the EIS has put forward this proposal with no alternative offered. It remains the responsibility of Transurban to sit down with RMS and design a suitable temporary arrangement along Pennant Hills Rd that would allow heavy vehicles to access the southern worksite (for instance a right turn into Eaton Rd at Copeland Rd or a new direct right turn into the worksite further south towards the M2). It is not acceptable that RMS

simply refuse to entertain any thought of heavy vehicle access from Pennant Hills Rd as it has apparently done to date.

The WPHVPA requests the DPE to require Transurban and the RMS to work together to develop a suitable heavy vehicle access strategy that will not require the use of the local road network.

6 Excessive Noise along M2 from Integration Works

A number of homes adjacent to the M2 have received letters advising of anticipated high noise levels, exceeding noise standards, as a result of the **NorthConnex** project. These same residents have suffered 3 years of excessive noise associated with the M2 Upgrade works and now are expected to suffer more years of noisy construction and post construction activity. The frustration here for these residents is that during the M2 Upgrade process, some 1000 submissions were made complaining about noise and yet Transurban did nothing to address these concerns. The promised noise cameras were not implemented and the Heavy Vehicle Noise Strategy required by the DPE as part of the approval conditions, was not produced. This current EIS gives no comfort that noise issues will be addressed this time around. Without a firm DPE directive, the likelihood is that based on past performance, Transurban will again seek to avoid doing anything meaningful to reduce noise.

The WPHVPA requests the DPE to ensure that Transurban does not continue to ignore the excessive noise levels generated along the M2 and addresses this major and continuing problem during construction and operation of the integration works, including the installation of already-promised noise cameras.

7 Environmental Damage to Blue Gum Creek

Blue Gum Creek was once a beautiful waterway. It is now a severely eroded, weed infested series of stagnant pools and ditches that has been seriously damaged by stormwater runoff and lack of maintenance by Transurban and RMS following construction and widening of the M2. As a result, localised flooding and damage to property has already occurred and the anticipated discharge from the **NorthConnex** project of up to 40 litre/sec will exacerbate the problems.

After many years of lobbying by WPHVPA, the RMS has finally begun to undertake some site investigation works prior to any rehabilitation of the Creek. There is now great concern that the **NorthConnex** project will cause further deterioration of the Creek due to increased stormwater flow from an increased detention basin, tunnel drainage and groundwater flow and runoff from tunnel wash-downs. The EIS contains no strategy for addressing these issues (for example by using the grey water for watering the PH Golf course) and in particular there is no provision for any remedial action. In our experience Transurban has an extremely bad record on this matter and it is essential that a monitoring and an ongoing maintenance program be implemented to ensure the Creek's long term health and prevent further damage to property.

The WPHVPA requests the DPE to not only oblige Transurban to address past damage caused by M2 works, but also ensure that the company has an ongoing management plan to prevent any further damage. Past damage must be addressed before the commencement of any work associated with the

NorthConnex proposal. Transurban should also be obliged to investigate ways of making grey water available for use by the local community to minimise the volume discharged.

8. Lack of Direct Connection from Southbound Tunnel to M2 East

Southbound traffic intending to travel east on the M2 will need to exit the tunnel at Pennant Hills Road, then queue at traffic lights before turning left on to the M2. One of the important design features of the **NorthConnex** tunnel is that traffic will keep moving, yet the lack of a direct connection to the M2 east is likely to cause queuing in the tunnel exit to Pennant Hills Road, particularly at peak times. Although provision has been made for a future connection, delaying it seems unnecessary and would result in yet another period of construction and disruption for local residents.

WPHVPA request the DPE to oblige **NorthConnex** to provide a direct connection from the southbound tunnel to the M2 east from commencement of the project.

9 Impact on Local Roads Following Tunnel Completion

The local road network is already severely compromised by traffic moving to and from the M2. During morning and evening peak periods, roads such as Oakes, Aiken and North Rocks Rds are at a standstill and congestion is exacerbated by the approximately 450 vehicles parked on street around the Oakes Rd M2 bus station (counted in a local survey 5 August 2014). The 'rat-runs' such as the one using Murray Farm Rd to access the M2 complicate matters further. It is highly probable that access to the **NorthConnex** tunnels will engender a whole new series of traffic movements through the area including lots of shortcuts from adjoining suburbs trying to find the best and most direct means to access the tunnel.

The EIS makes no attempt to evaluate these likely local traffic impacts and there is no commitment by Transurban that it will address any problems that may emerge in the future. Clearly **NorthConnex** will impact on the local road network and Transurban should be held responsible for any remedial action.

The WPHVPA requests the DPE to require that Transurban prepare a management plan that will make it responsible for addressing and resolving local road issues attributable to the **NorthConnex** project.

CONCLUSION

The WPHVPA appreciates the opportunity to make this submission to the Department of Planning and Environment. Please do not hesitate to contact us should any clarification be required.

It is important to stress on behalf of the large community impacted at the southern end of the **NorthConnex** project that a number of major issues such as air quality and heavy vehicle movements have not been adequately dealt with in the EIS.

The community is looking to the Department to forcefully raise our concerns not only with Transurban, but also with the RMS, to minimise the social and environmental impacts of this major undertaking on the lives of our local residents.