

Director Infrastructure Projects
 Department of Planning and Environment
 Major Projects Assessment
 GPO Box 39
 SYDNEY NSW 2001

Dear Sir

Northconnex Project Application Number – SSI 13_6136

Thank you for the opportunity to comment on the Environmental Impact Statement for this project. I have become personally acquainted with its details through family members that live in Wahroonga close to the proposed Northern Ventilation Facility. I am a qualified and practicing town planner, so also have a degree of professional interest in this project.

In this context I would like to make the following comments:

1. Support in principle for M1-M2 linkage

In principle I support the construction of this project, as it is a logical linkage between the M1 and M2 and extension of the Sydney Motorway system. It will provide clear benefits, especially outside of peak hour, as a much quicker and safer alternative to Pennant Hills Road.

2. Public transport improvements on Pennant Hills Road

Construction of this project gives the opportunity to provide bus public transport improvements along Pennant Hills Road, as is noted in the EIS. While they outside of the scope of the EIS, I would commend such improvements to be implemented quickly before traffic volumes rise again, and for even more dedicated measures such as peak hour bus lanes to be considered.

3. Northern Ventilation Facility

3.1 Location

The location and design of this facility is a major disappointment of this project. In terms of location it will be clearly out of character in terms of scale and use with the low density residential area in which it is proposed to be located, which is also a Heritage Conservation Area. If there are any future air quality impacts not currently known or envisaged, then it will adversely impact upon the adjoining residential area which has a large number of acknowledged sensitive uses.

A more preferable location for this facility would seem to be in the industrial area to the north of this area. The industrial nature of the facility is far more compatible with such an area, and the other impacts would be minimised. I understand that other interested parties are investigating the feasibility and costs of such an option. An alternative location should be seriously investigated as the location of this facility is not desirable.

3.2 Heritage, Landscaping and Design

The EIS suggests that the heritage impact of the Northern Ventilation Facility on the Wahroonga North Heritage Conservation Area (WNHCA) will be minor, and makes the following statement on heritage impacts:

Impacts to heritage values within the conservation area would be localised to specific areas already associated with major transport network infrastructure.

The overall heritage value of the heritage conservation area would not be significantly impacted by the proposed works.

In response to this, firstly the directly affected area is not already associated with major transport infrastructure. It is residential in character, and while the motorway is nearby, it is not visible from the conservation area.

The impact of the ventilation facility on a conservation area the size of the WNHCA will clearly be localised. However the local impact on the Woonona Avenue North part of the HCA and immediate surrounds will be significant and clearly detrimental. The facility is clearly out of character with the residential nature of the area. The bulk of the facility and associated structures is not compatible with the low rise scale of surrounding development. As well it has not been designed aesthetically with any sense of respecting the heritage values of the area. If this was a “normal” proposal it would be rejected immediately.

The recommended environmental management measure in the EIS is as follows:

Landscaping of ancillary infrastructure sites would be undertaken with consideration of the heritage values of the Wahroonga North heritage conservation area and Beecroft Cheltenham heritage conservation area.

There is the possibility of more intensive landscaping at the northern end of the facility which will provide screening. However on the Woonona Avenue North frontage the main screening will come from street trees in front of the noise barrier wall. This landscaping is provided on the street reservation (owned by Hornsby Council) rather than on the site of the facility, and the EIS is silent on whether agreement has been reached for this to happen and who will have maintenance/planting responsibilities.

In terms of screening the facility the proposed trees in this area appear in terms of height to be adequate, however this is provided they reach their full potential, which is not always predictable. The depth of the landscaping with only one layer of trees would appear to only provide partial screening. The trees also will take 10-20 years to reach maturity, so for a considerable period of time the facility will be effectively unscreened in any sense at all on Woonona Avenue North. This is evident in the artist's impressions which show the facility unscreened by the immature tree plantings. My conclusion is that landscaping cannot be guaranteed to safeguard the impact of this facility on the WNHCA.

It will be difficult to integrate such a facility successfully within this area. As previously suggested it is far more preferable that the facility be alternatively located so it does not have these impacts. If there is no feasible option but to provide the northern ventilation facility in its proposed location, then there should be input into its design on the residential interface by a qualified heritage consultant. This appears not to have occurred. Such input would be the norm for any substantial development in a Heritage Conservation Area.

Along with involving a heritage consultant, it is suggested that consideration should be given to the following in the design of the facility to reduce its impact:

- Minimising the bulk and height of the facility as much as possible.
- Using materials and a building design that is in keeping with the conservation area.
- Relocating the deluge tanks so both are as close to the Motorway as possible, enabling again a greater area of perimeter landscaping to be provided.

4. Assessment of air quality impacts

I understand the CAPS group will be making a detailed submission on air quality issues. I am not qualified to comment meaningfully on the technical aspects of these issues, so I commend their submission to you as I am sure they have thoroughly investigated the issues.

5. Monitoring of air quality

The EIS on page 528 outlines the following measure in relation to monitoring of air quality:

Air quality in the vicinity of the project would be monitored for a specified time period following project opening. If pollutant concentrations contributed by the project are above predicted levels, additional feasible and reasonable mitigation measures would be considered to meet applicable predicted limits.

I would think it not unreasonable to expect on-going monitoring of air quality in the vicinity of the ventilation facilities, for the life of the operation of the tunnel.

The project is proposing two ventilation facilities, both quite close to residential areas containing some sensitive uses. Residents especially in close proximity to the ventilation facilities, who will likely bear the brunt of emissions from the tunnel, should be safeguarded from having to cope with poor air quality. I can see three scenarios that could come into play:

- Improvements over time in research about the impacts of pollutants.
- Changes over time in traffic conditions in the tunnel.
- Forecasting not accurately predicting the real life situation.

I would also suggest that the monitoring **in the immediate local area** be carried out every three months (or other agreed suitable time) by the NSW Department of Health, and that there be a commitment by RMS to take immediate mitigation action should pollutant concentrations be above safe levels.

6. Presentation of website information

While not a comment on the EIS, you may find the following feedback on my experience of accessing the information online, from both the Northconnex and Department of Planning and Environment websites.

The Northconnex site did not have the option of providing larger files, so using this site meant having to often open numerous small pdfs to find out information. This made finding information frustrating and more time consuming for me, and I am sure for anyone else using it. Some of these files were not specifically labelled as to their content – calling files Part 1, 2, 3 etc. without further description is not helpful.

The Department of Planning and Environment site did commendably have the option of small and big file sizes. However these large files were not at all specifically labelled, and again required opening unnecessary files to find information. More specific labelling of these files would have helped in finding information a lot easier.

In summary the location of the Northern Ventilation facility is a significant concern. If it cannot be relocated, then its design and the monitoring of emissions, need further review. Thank you for consideration of these comments.