

Director - Infrastructure Projects
 Department of Planning and Environment
 Number: SSI 13_6136
 Major Projects Assessment
 GPO Box 39
 SYDNEY NSW 2001

NorthConnex Application Number: SSI 13_6136

Please find below my submission in response to the exhibition of the EIS for NorthConnex.

I wish to register my **OBJECTION** to the project as described in the EIS.

There are a number of issues that I am concerned about, as set out hereunder;

1. . **A 2010 report co/authored by Gerda Kurschel, the independent expert retained by NorthConnex** for the air quality forum, titled 'Stocktake of Air Quality around State Highway Tunnels, states '**One of the great advantages of road tunnels is the opportunity to deliberately site portals (or stacks) away from sensitive receptors so that road transport emissions may be removed from dense residential areas improving local air quality**'. The current proposal has the stack in the middle of a residential area and school precinct that has over 9,000 school children.
2. **As there have been no air quality studies conducted in the immediate locality (or if there has been it has not been disclosed at any of the forums and within the EIS) say, up to 500m of the proposed stack site, how can a layer of further contamination and pollution be justified particularly given the paucity of current lack of information on conditions.** I consider that the Air Quality studies should have preceded any consideration of the site and therefore the EIS is deficient in this regard.
3. . **There are better options, such as extending the tunnel a further 2km (either by tunnel, cut and fill or a combination of both) to exhaust the stack within the industrial area away from residential areas.**
4. **The EIS section on health effects has been prepared having regard to the Air Quality advice from NorthConnex.** As I consider that their studies are based on modeling of information from areas of differing topography and surrounding forms, and not from the actual site the quality of the analysis must be questioned
5. **I am concerned about the project including future provisions for portal emissions in densely populated areas** The only safe option, by having portals and stacks within a residential area, is to filter the exhaust from the tunnel.

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6. **I am concerned about the large amount of diesel emissions which will be emitted from the NorthConnex tunnel, As diesel emissions have been classified as carcinogenic by the World Health Organisation**
7. **I am concerned about the multiple flaws in the air quality modelling of the northern stack in the EIS.** These flaws, which can adversely affect the inputs into other studies contained in the EIS, include:
 - a) Extrapolation of meteorological data from other weather stations which do not reflect the local meteorology, local topography, and the valley location.
 - b) The use of a coarse topographical model
 - c) The failure to consider polluted intake air from the Pennant Hills/M2 interchange as part of the project contribution to air quality at Wahroonga
 - d) the background air quality being based on air quality at Lindfield and Prospect and the lack of any actual data on PM_{2.5}
8. **I am concerned that a full and transparent options assessment process was not undertaken to assess alternative designs for the project.** Unlike other tunnel projects in Sydney there are alternatives for locating the stack and portals in non-residential areas.
9. **I am concerned that the justification for not providing filtration for the stacks is cursory and unconvincing.**
10. **Providing filtration would appear to be a solution, provided it is not turned off. Lack of filtration would appear to be cost based rather than good outcomes for the nearby population.**
11. **I also have concerns as to the traffic information within the EIS. From my reading of the traffic section of the EIS it would appear that the basis of estimating future traffic flows is based upon the developer's model rather than being obtained from or estimated by independent sources**

To capsule my concerns;

1. The air quality and human health impact assessment need to be revised to address the issues raised above.
2. An independent options assessment process should be undertaken to assess alternative locations for the ventilation stack and portals.
3. To undertake a Life Cycle Analysis and assessment for the provision of filtration.
4. The future traffic flow information is provided by an independent party.
5. Due to significant public funding committed to this project, that the financial projections be audited in order to protect public monies.
6. A long term health study on children and residents in areas impacted by stack discharges be included as part of the conditions of approval.
7. A comprehensive air quality monitoring program is developed and implemented.
8. An independent review of the ventilation system is undertaken to ensure that NorthConnex's claim of no portal emissions is justified.
9. Portal emissions from NorthConnex in the future are banned.

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10. The Submissions Report/Preferred Project is exhibited to allow the community to respond to the revised information contained in the report.
11. The Department does not approve the project in its current form as it clearly does not meet the principles of Ecologically Sustainable Development as required by the Environmental Planning and Assessment Act.

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