

10 September 2014

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 NOTE: I have included my personal information as a form of introduction. I DO NOT wish this information to be made public and request that it is blacked out, specifically my name, address and phone no. I am agreeable to my name being on a general list of submitters.**

My name is [REDACTED]. I am a resident of Wahroonga and gravely concerned by the 'rushed' planning process for the 9km NorthConnex tunnel. I have attended the community forum hosted by NorthConnex at Hornsby RSL as well as the Doctor's health forum.

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

Firstly I would like to state I object to the project as described in the EIS.

I object to the location of the northern ventilation on the corner of Bareena and Woonona Ave, Wahroonga.

- The placement of the northern ventilation stack in a valley in residential Wahroonga where there are often low wind speeds will result in poor dispersion and exposure to community to high levels of tunnel emission.
- NorthConnex purports that the Northern ventilation outlet cannot be moved further north into the industrial area because it would 'result in an additional tunnel support facility, more private property acquisition [for the tunnel support facility and ventilation outlet] and increased truck movements to remove the additional spoil. It is estimated by Transurban that this would cost over \$450 million in construction costs, plus property acquisition and increased operating costs for the longer tunnel'. In my opinion,

this is a negligible amount. Future generations will look back and lament this small cost. Cost cutting must not be put before good tunnel design and health concerns. Were it to cost double that, it would in my opinion be worth it. An increase in the toll duration could be used to fund it.

- When he released details of the plant, Barry O'Farrell has been quoted as saying, "By removing thousands of trucks a day from surface roads, we will improve the lives of tens of thousands of people living near Pennant Hills Road". The 'tens of thousands' living within 2km of the stack should not be forced to bear a greater health burden to benefit the "tens of thousands" living near Pennant Hills Rd. All citizens are of equal value and no child's health should be 'traded' for that of another.
- I am concerned that portal emissions may be considered in the future. These emissions are at ground level and thus extremely dangerous. I believe there is a high potential that this could occur as happened in the case of the M5east, when local residents were not informed that this was occurring. At the time, a NSW health study was being conducted regarding the health impacts of the M5E stack. NorthConnex' claim that there will no portal emissions from current proposal cannot be verified.
- An excerpt from a 2008 report by the National Health and Medical Research Council of Australia states, 'Road tunnels convert a line source (the road) into one or a few point sources (portals, stacks). This represents a redistribution of pollutants, generally reducing concentrations over a large area, while increasing concentrations in a small area around the point sources. In the hypothetical case of an even population distribution (and an immobile population) over the district, a road tunnel asks a few people to bear a greater health burden on behalf of the majority who benefit from better air quality. This may seem unacceptable, especially if those living near the point sources do not gain as much from the transport benefits of the tunnel. However, this is not the case if the point sources (and their 'impact zones') can be located in areas of reduced or zero population density, or dispersion can be designed in such a way that the increased burden is negligibly small. This should be the goal of good tunnel design.' The current location has a very high residential and school going population within 1.5km

of stack, thus the location of the northern ventilation does not constitute good tunnel design.

#### IMPACT ON HERITAGE LISTED HOMES/AREA

- I am concerned about the potential impacts to heritage items including:
  - Vibration impacts
  - Settlement impacts
  - Visual impacts
  - Negative property price impacts
  - Social impacts

The heritage chapter of the EIS has inconsistencies and in some cases uses out-dated significance assessments as the basis for investigation of impacts. In addition, the low legibility of the document, cross-referencing to technical papers are not interpreted. Maps that are almost illegible make it difficult to clarify points of confusion.

- I am concerned about the large amount of diesel emissions which will be emitted from the NorthConnex tunnel, as it is being designed for heavy freight to bypass Pennant Hills Rd. Diesel emissions have been classified as carcinogenic by the World Health Organisation, and also contain a larger number of fine particles which penetrate deep into lung tissue and remain there causing inflammation.
- I am concerned about the multiple flaws in the air quality modeling of the northern stack in the EIS. These include:
  - The use of meteorological data from other weather stations, which do not reflect the local meteorology, local topography, and the valley location.
  - The use of a coarse topographical model
  - The failure to consider polluted intake air from the Pennant Hills/M2 interchange as part of the project contribution to air quality at Wahroonga
  - the background air quality being based on air quality at Lindfield and Prospect and the lack of any actual data on PM<sub>2.5</sub>

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- 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.
- I am concerned that the justification for not providing filtration for the stacks is not convincing.

To address my concerns, I request that the following actions are undertaken:

1. I would like the OEH to perform a detailed assessment on the direct and indirect impacts of the northern ventilation on historic homes and conservation areas, particularly heritage, social, economic, environmental and visual impacts. The project should not be approved by the OEH in its current design.
2. I would like to see NSW Planning do an Independent Options Assessment to assess alternative locations for the northern ventilation stack and portals.
3. I would like to see local residents provided with more specific detailed information about proposed dispersal of the tunnel pollution and ventilation methods, so they can be fully informed of the local health impacts of the project.
4. I would like a local benchmark to be established to enable appropriate modeling of air quality changes.
5. I would like the State government to apply the Precautionary principle in light of evidence that diesel emissions are carcinogenic.
6. I would like to see precise numbers provided by the statisticians as to how many children attend childcare, preschool, K – Yr.12, daily within 2 km of the northern ventilation stack, so that the risk factors for adverse health impacts on those most vulnerable are appropriately assessed.
7. I would like the following information provided to residents in the

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postcodes of Wahroonga 2076 and Hornsby 2077 so that we may be informed as to a base-line for comparing the current air quality situation with the NorthConnex project's projections of air quality impacts,

- 2012/2013 asthma data
  - 2012/2013 lung cancer register data
  - 2012/2013 COPD data
  - AQI data (including PM2.5 and PM0.1) collected at the proposed sites for the portals and within 1-km and 2-km of the ventilation stacks.
8. I would like to see NSW planning undertake an independent assessment for the provision of filtration. I see no reason why Planning NSW should approve a 'flawed' design.
9. I would like NSW Planning to 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.

Yours Sincerely

A large black rectangular redaction box covering the signature area.