

Director Infrastructure Projects  
 Department of Planning and Environment  
 Application number - SSI 13\_6136  
 Major Projects Assessment  
 GPO Box 39 Sydney NSW 2001

11/9/14

Dear Sir or Madam

Re: NorthConnex Application Number: SSI 13\_6136

The submission is submitted by Councillors Ryan Tracey, Raymond Harty OAM and Tony Hay OAM Councillors of the Hills Shire Council and represent a minority report in the form of a submission that differs from the position by way of a resolution adopted by a majority of Councillors at the Council Ordinary meeting held on 9 September 2014.

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

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

We have a high level of concern regarding the following issues and request that these be considered by NorthConnex and the Department of Planning. In regards to the NorthConnex tunnel we are concerned about:

Concerns regarding lack of Filtration of the ventilation stacks to provide a safe and sustainable environment.

It would be in the best interest that NorthConnex investigate the best quality air filtration system using the latest in world class technological design and to install this system in all four ventilation outlets of the M1 – M2 twin tunnels.

That it would be imperative that Air Filtration Systems must be included in this twin tunnel proposal; In addition, this project must be forced to comply with the National Plan for Clean Air recommendations when they are introduced in late 2014.

As part of ensuring public health standards: that independent, on-going monitoring of air quality around the tunnel exit portals must be undertaken for the life of the tunnels, to ensure that the air quality remains of the highest standard. This will guarantee that the long term health effects of the tunnel can be appropriately assessed.

That Northconnex research “world best practice” in air filtration systems and that the best possible air filtration systems be installed in all Australian Tunnels starting with the proposed Northconnex twin tunnels.

That as a condition for any further progress in the planning process, Transurban must be required to issue an international registration of interest by suitably qualified and experienced filtration suppliers for the design, supply, installation and commissioning of an efficient filtration system for the NorthConnex tunnel. Sufficient of the results of the registration should be made public to enable an assessment of the actual cost and likely impact of the use of such equipment on both the economics of the tunnel operation and its long term health and environmental impacts.

In regards to reducing the impact of harmful Diesel fuel emissions and other toxins that the Government ensures that the southbound ventilation facility ie the Stack, be properly filtered and located at the south-west corner, on the RMS owned land, at the edge of the Pennant Hills Golf course. In this location, the southbound tunnel can be efficiently, effectively and economically filtered and ventilated.

The twin tunnels must be connected to a filtered ventilation stack at the Southern Interchange. Documented evidence must be provided with details describing and demonstrating how the connection will work. Time for public scrutiny must be provided.

The provision of diagrams and detailed description of what ventilation is proposed for the southbound tunnel at the Southern Interchange is completed. (Showing connection of the ventilation stack and the south bound tunnel).

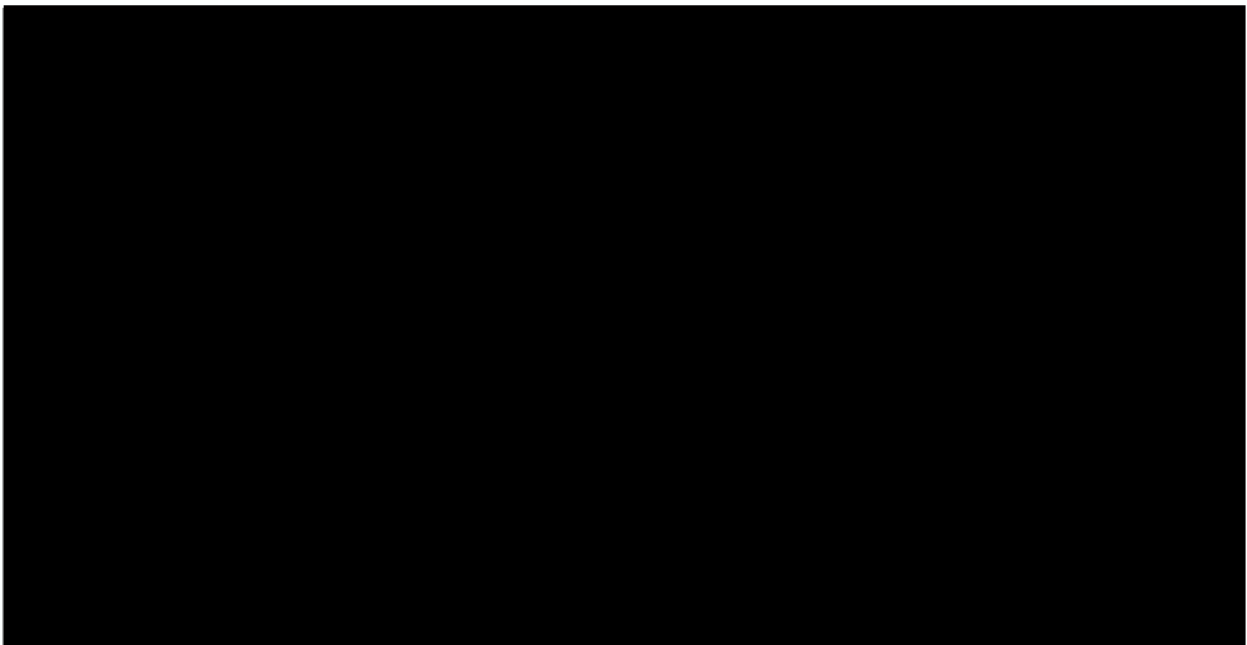
In terms of Public Health interest we would recommend an independent authority undertakes a full cost analysis of the adverse health effects of polluted air from traffic emissions on human health.

In regards to maintaining a quality of life that the restoration and preservation of the landscape around residential properties, especially along the M2 and those homes immediately close to the construction compounds and boundary walls, is of vital importance.

It would be advised that on-going community consultation is seen as important and necessary. More information and detail must be provided.

That an independent organisation should monitor the toxicity of the water and the rate at which it is released into Blue Gum Creek. Every care should be taken to avoid flooding the homes located close to the creek.

In regards to the detention basin in Lisle Court Reserve that any extension to the existing detention basin must be minimised as far as possible so that it does not unduly encroach on this Council Reserve. Furthermore, it is imperative that the residual land, after completion of the works, is not denied to the local community.



**Below are the recommendation's that were removed from The Hills Shire Council submission**

9. The report relies largely on the purchase and retirement of BioBanking credits, including Blue Gum High Forest (163 ecosystem credits), and *E. purpurascens* var. *purpurascens* (potentially 1,767 species credits). The issue of impact on Blue Gum High Forest will be particularly difficult to offset as there are so few sites with Blue Gum High Forest left. Offset sites or credits should be identified and procured prior to works commencing.
10. Specific priority should be given to securing offset sites as near to the location of the impact/loss as possible, to assist with the preservation of the specific endemic community of the area and assure that the ecological and amenity benefits of retaining endemic vegetation remain within the Local Government Area.
11. The Offsets are reviewed against the Office of Environment and Heritage's Principles for the use of Biodiversity Offsets in NSW. It notes 'discounting of offsets due to significant social and economic benefits accruing to NSW would be the subject of discussions with NSW Department of Planning and Environment'. The proponent is encouraged to avoid pursuing the discounting of offsets, in order to ensure that the real impacts on biodiversity are appropriately and fully compensated for through mitigation or offset measures (where avoidance is not possible).
12. The Flora and Fauna Management Plan, Microbat Management Plan and Offset Strategy are to be provided to all affected Councils for review prior to approval.
13. Should the project require the translocation of *E. purpurascens* var. *purpurascens* individuals, a monitoring program should be developed and implemented over an adequate timeframe in order to monitor and report on the long-term success of this management action. Should translocation fail, then the adequate number of BioBanking credits should be purchased and surrendered to compensate for their loss given that the impact is deemed to be significant for this species.
14. (Not removed)
15. A significant number and range of nest boxes should be carefully selected and placed in suitable locations as a means of providing habitat for the variety of species that may be using the existing hollows including microbats, Glossy Black Cockatoos and large forest owls. Consideration should be given to the reuse of the hollows cut from trees removed in the construction footprint, and securely attached to trees within adjacent bushland areas. The removal of trees containing hollows should be avoided if at all possible. The use of the nest boxes and reused tree hollows should be monitored over a longer timeframe in order to monitor and report on the success of this management action.
16. The report identified a variety of mitigation measures associated with greenhouse gas emissions and climate change. Many of these are broad sweeping statements, such as '*emissions intensity of construction materials would be considered during procurement*' and '*fuel efficiency of the construction plant and equipment would be considered during selection*'.  
  
There is a concern that this would be overlooked through the decision-making process and therefore it is recommended that mechanisms such as policy, setting minimum standards and targets be established early in the process to ensure that greenhouse gas emissions are a key element of decision-making for procurement, detailed design and operation of the project.
17. Consideration should be given to the development of a Greenhouse Gas Emissions Management Plan in order to document the above mechanisms to ensure that emissions from the construction and operation of the project are reduced as much as possible and that climate change impacts are appropriately incorporated into the project.

We feel it necessary as part of our submission that the above recommendation's from The Hills Shire Council original report are also considered (we have attached a copy of the original report with all of the recommendation's prepared by the professional officers at The Hills Shire Council).

In closing we feel it necessary to send this minority report as a quarter of The Hills Shire Council to carry out our duties as Councillors to properly manage, develop, protect, restore, enhance and conserve the environment of the area for which it is responsible, in a manner that is consistent with and promotes the principles of ecologically sustainable development.

Faithfully Yours,



Councillor Ryan Tracey



Councillor Tony Hay OAM



Councillor Raymond Harty OAM

#### ATTACHMENTS

1. ITEM 4 NORTHCONNEX – ENVIRONMENTAL IMPACT STATEMENT
2. Draft Minutes The Hills Shire Council ITEM 4 9<sup>th</sup> September 2014