

12 September 2014

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

Dear Sir,

***NorthConnex Application Number: SSI 13\_6136***

Below is our submission in response to the recent exhibition of the EIS for NorthConnex.

We have lived in Wahroonga for over 30 years, and more specifically in Woonona Avenue, Wahroonga for 23 years. Being long-term residents we understandably have a significant interest in the urban and social amenity of our local area and the quality of life enjoyed by ourselves and the local community generally.

We have considered all the information made available to us regarding the NorthConnex project as described in the EIS, and we want to express our objection to the project as it stands.

It needs to be said that we do not object to the idea of the road tunnel as such. There is a significant need to address growing traffic congestion in this part of northern Sydney. However we do have a number of specific objections to the current proposal as it stands, and we request reconsideration of these matters. Our objections are listed below:

1. We are concerned that the proposed location of the northern ventilation stack is in the middle of a recognized heritage conservation area. The stack's function and appearance are totally inappropriate for this site, and the selection of this site is highly insensitive to the values and aspirations of the local community. There are many other places it could be moved to.
2. We are concerned that the proposed location of this stack is in the heart of the residential suburb of Wahroonga. With continuing urban consolidation, the residential population of this suburb is already dense, and it's inexorably growing. As things now stand, nearly 10,000 school children would be exposed to the emissions from the proposed ventilation stack if it remains in its current location. It is also much too close to local hospitals, of which Hornsby Hospital is particularly close, as are a large number of medical and aged care facilities, child care centres, churches, shops, businesses and private homes.
3. We are concerned that the site of the proposed northern ventilation stack is in a valley where there are often low wind speeds. This will result in poor emission dispersion and consequently high exposure of the community to these emissions. Being residents in this street, we strongly object to being exposed to such emissions.
4. We are very concerned about the number of large scale research studies that suggest the impacts of air pollutants on health can be serious. These include increased death from heart disease, increased risks of lung cancer, stroke, poor lung growth in children, increased asthma, and recent research suggesting low birth weight for pregnant women, increased autism, and congenital heart defects. These studies confirm that air pollutants have prothrombotic and inflammatory effects on people and can result in many different health problems.

5. We are concerned that the NorthConnex project makes provision for future portal emissions in densely populated areas, which will result in emissions remaining at ground level, exposing the local population to pollutants. We are also concerned that NorthConnex's claim that there will be no portal emissions from the current proposal cannot be verified.
6. We are concerned about the significant quantity 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 can lead to inflammation and breathing difficulty.
7. We are concerned about the air quality inside within the tunnel which the EIS indicates will exceed recognized standards for pollutants such as NO<sub>2</sub>, and haze from particulate matter at the ends of the tunnel.
8. We are concerned about the flaws in the air quality modelling of the northern stack in the EIS. These 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, and
  - d) 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>
9. We are concerned about the lack of any transparent options assessment process to assess any alternative project designs. There are many potential non-residential alternatives for locating both the stack and the portals.
10. We are concerned about the unsatisfactorily cursory attempt to justify the absence of any emissions filtration in the stack.

In response to our concerns, we request that:

1. The air quality and human health impact assessment be revised to address the issues we have raised above;
2. An independent options assessment process be undertaken to assess alternative locations for the ventilation stack and portals;
3. A Life Cycle Analysis and assessment for the provision of filtration be undertaken;
4. A long term health study on children and residents in areas impacted by stack discharges be included as part of the conditions of approval;
5. A comprehensive air quality monitoring program be developed and implemented;
6. An independent review be conducted of the ventilation system to ensure that NorthConnex's claim of no portal emissions is justified;
7. Portal emissions from NorthConnex in the future be prohibited;
8. The Submissions Report/Preferred Project be exhibited to allow the community to respond to the revised information contained in the report; and

9. 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.

*Peter McCulloch*  
*Lyndall McCulloch*  
*Gerald McCulloch and*  
*Esme McCulloch*

37 Woonona Avenue  
Wahroonga NSW 2076