

12 September 2014

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

Via online form:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=6136

NorthConnex Application Number: SSI 13_6136

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

We **strongly object** to the project as described in the EIS.

We live at 42 Woonona Avenue Wahroonga with our four school age children. Our house was built in 1897 and is listed in the local heritage register. Our house is within 200 metres of the proposed northern ventilation stack.

Until early September, other than generic leaflets put in our letterbox, we had received no personal communication whatsoever from NorthConnex, either written or verbal. We find this astonishing given the significant negative impact that NorthConnex is proposing to have, both on our family's health and on our family's financial future through the devaluing of our property.

The letter we received recently informs us that NorthConnex is intending to have a major negative impact on our quality of life. Our children will be in Year 12 in 2016, 2018, 2019 and 2021 respectively. We understand the current noise walls along the M1/F3 near our property will be removed and may not be replaced for some years. These years will be critical in our children's education and NorthConnex is proposing to significantly degrade their study conditions with a foreseeable negative impact on their results and future. The letter informs us we may be eligible for noise treatments. We don't believe these proposed treatments will fit aesthetically, if at all, with our 117-year-old home and we are unsure what difference they will make. They certainly won't assist at all outdoors.

There is an obviously better alternative to the currently proposed northern entry and exit points to the NorthConnex tunnel. These entry and exit points can be moved further north adjacent to the industrial area and the Ku-ring-gai National Park and away from all residential areas. Ideally, the entire M1/F3 could then be funneled into the NorthConnex tunnel at that point, with a toll possibly only being levied for vehicles that proceed in the tunnel south beyond Pearce's Corner. Pacific Highway and Pennant Hills Road traffic would exit at Pearce's Corner. This would free up a swathe of prime residential land that the State Government could then sell to cover most if not all of the cost of the tunnel extension.

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This would restore the heritage and conservation areas of Wahroonga to their rightful state and return a prime residential area to being residential. Any incremental cost is not significant in terms of the overall project and the benefit to the community is significant.

Leadership takes courage and it will take courage for our state leaders to do the right thing in this case.

Until the location of the northern entry and exit points of the NorthConnex tunnel are moved further north, we remain very concerned about the following issues and request that NorthConnex and the Department of Planning consider them. With respect to the NorthConnex tunnel, we are concerned about:

1. Placement of the northern ventilation stack in the centre of a densely populated residential area in Wahroonga, where 9,300 school children will be exposed, as well as multiple aged care facilities, hospitals, businesses and homes.
2. The placement of the northern ventilation stack in a valley in Wahroonga where the wind speed is often low, resulting in poor dispersion and the community therefore being exposed to high levels of tunnel emissions.
3. There are multiple large-scale research studies that suggest the impacts of air pollutants on health are serious. These include increased death from heart disease, increased risk of lung cancer and stroke, poor lung growth in children and increased asthma. There is also recent research suggesting low birth weight for the children of pregnant women, increased autism, and congenital heart defects. These studies confirm air pollutants have prothrombotic and inflammatory effects on humans which cause the above health problems.
4. We are concerned about the project including future provision for portal emissions in densely populated areas, which will result in emissions remaining at ground level, and hence 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.
5. As the NorthConnex tunnel is being designed to enable heavy freight to bypass Pennant Hills Road, we are concerned about the large amount of diesel emissions that will be emitted from the tunnel. 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.
6. We are concerned about the air quality within the tunnel, which is shown in the EIS to exceed the standard for pollutants such as NO₂, and haze from particulate matter at the ends of the tunnel.
7. We are concerned about the multiple flaws in the air quality modelling of the northern stack in the EIS. These include:
 - a) Extrapolation of meteorological data from other weather stations that do not reflect the local meteorology, local topography, and the valley location.

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- 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. We are 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. The obvious one has been described above.
9. We are concerned that the justification for not providing filtration for the stacks is cursory and unconvincing.

To address our concerns we request that the following actions are undertaken:

- 1. The air quality and human health impact assessment is revised to address the issues raised above.
- 2. An independent options assessment process is undertaken to assess alternative locations for the ventilation stack and portals.
- 3. A Life Cycle Analysis and assessment for the provision of filtration is undertaken
- 4. A long-term health study on children and residents in areas impacted by stack discharges is included as part of the conditions of approval.
- 5. A comprehensive air quality monitoring program is developed and implemented.
- 6. An independent review of the ventilation system is undertaken to ensure that NorthConnex's claim of no portal emissions is justified.
- 7. Future portal emissions from NorthConnex are banned.
- 8. The Submissions Report/Preferred Project is exhibited to allow the community to respond to the revised information contained in the report.
- 9. The Department not to 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.

In conclusion, many of the issues we raise above can be addressed effectively by the relocation of the northern entry and exit points of the NorthConnex tunnel further north into the industrial area and the national park and away from all residential areas. Making this decision, doing the right thing, will take courage from all the leaders involved. We look forward to this occurring.

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