

Ryde Community Alliance

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10 Sept. 2014

Major Projects Assessment

GPO Box 39

SYDNEY NSW 2001

NorthConnex Application Number: SSI 13_6136

Ryde Community Alliance welcomes the opportunity to provide our submission on the EIS for NorthConnex. Our organization which comprises several community groups across the Ryde LGA was formed specifically to campaign against overdevelopment and the inappropriate planning proposals and approvals that impact upon the people of Ryde LGA.

The NSW Government was elected on a platform of returning planning powers to the local community following the imposition of ad-hoc approvals such as the Ryde Rehabilitation Centre redevelopment and the Top Ryde Shopping Centre redevelopment. These approvals ignored existing land use and planning controls prepared by Ryde Council and approved by the State Government over several decades. The NSW Government has failed to deliver on its election promise and ad-hoc planning continues with overdevelopment and unsolicited proposals such as NorthConnex being prioritized over projects that would provide long lasting benefits to the entire Sydney region.

We would like to state our strong objection to the project as described in the EIS.

The Alliance has serious concerns regarding the following issues and requests that these be given full and proper consideration by NorthConnex and the Department of Planning.

- The NorthConnex tunnel proposal will impact on the health of the communities in the immediate vicinity of the tunnel stacks as a result of air pollution and construction activities, but it will also impact on the people of the wider Sydney area and especially Macquarie Park, North Ryde and surrounding areas by delivering in excess of 5000 vehicles per day into the two business parks which are part of the Global Economic Corridor. **Approval of the road tunnel is not recommended.**
- **The Metropolitan Strategy for Sydney identifies the importance of the two business parks for the future of Sydney as a Global City.** In excess of 15,000 dwellings in the Business Parks will also impact on their function as centres of specialized scientific research and health services provision,

technical support, as well as IT services provision. **The road tunnel will not enhance the role of the business parks in the Global Economic Corridor.**

- **The Alliance has requested that the Minister for Planning impose an immediate moratorium on development approvals in Ryde LGA and the sub-region, and further commence an urgent inquiry into planning and development approvals in the Ryde LGA since March 2011.**
- **The Alliance considers that, as existing traffic congestion on Epping Road, Lane Cove Road and Victoria Road is at environmental capacity, additional expenditure on road tunnels and expansion of the existing road system through further road widenings is not justified.** Every morning the Sydney Traffic reports on radio identifies that Devlin Street, Ryde is a car park! The addition of 5000 more vehicles per day will increase traffic congestion on arteries already at peak volumes seven days per week.

The Alliance is also concerned that there is a pre-determination by the NSW Government that a road tunnel will provide the long-term benefits for the Sydney Region. It is now time for the cost benefit analysis to be subjected to rigorous analysis given the negative impacts and health impacts predicted for the NorthConnex.

These negative impacts include the following:

- 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 many aged care facilities, hospitals, businesses and homes.
- The placement of the northern ventilation stack in a valley in Wahroonga where there are often low wind speeds, which will result in poor dispersion and exposure to community to high levels of tunnel emission.
- Multiple large scale research studies suggest that the impacts of air pollutants on health are extremely negative. They 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 air pollutants have prothrombotic and inflammatory effects on humans which cause the above health problems.
- The proposals for future provision of portal emissions in densely populated areas, which will result in emissions remaining at ground level, and hence exposing the local population to pollutants are not acceptable. NorthConnex's claim that there will no portal emissions from current proposal cannot be verified.
- The Alliance is 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 Road. 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.

- The air quality within the tunnel is stated in the EIS to exceed existing standards for pollutants such as NO₂, and haze from particulate matter at the ends of the tunnel.
- We are concerned about the multiple flaws in the air quality modelling of the northern stack in the EIS, including the extrapolation of meteorological data from weather stations at Lindfield and Prospect which are not directly relevant to topographical and weather patterns in the area to which the proposal applies.
- We are concerned that a full and transparent options assessment process was not undertaken to assess alternative designs for the project. There are alternative locations for the stack and portals in non-residential areas.
- We are concerned that the justification for **not** providing filtration for the stacks is cursory and unscientific.

We therefore request that should the NSW Government insist on pursuing the road tunnel proposal that the following actions be undertaken prior to any formal assessment and consideration of the proposal:

- The air quality and human health impact assessment be revised to address all of the issues raised above.
- An independent assessment of the options should be undertaken to assess alternative locations for the ventilation stack and portals.
- To undertake a Life Cycle Analysis and assessment for the provision of filtration
- A long term health study on children and residents in areas impacted by stack discharges be included as part of the conditions of approval.
- A comprehensive air quality monitoring program is developed and implemented.
- An independent review of the ventilation system is undertaken to ensure that NorthConnex's claim of no portal emissions is justified.

- Portal emissions from NorthConnex in the future are banned.
- The Submissions Report/Preferred Project be exhibited to allow the community to respond to the revised information contained in the report.
- 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.

Ryde Community Alliance is concerned that the massive scale of ad-hoc development approved by the NSW Government in the north-western sub-region of Sydney, and in particular in the North Ryde - Macquarie Park Business Parks and surrounding residential areas is not based on sound environmental planning principles.

Presently, there is no credible source of information on the future population of each local government area in the north-western sub-region. The Department of Planning should make available accurate population projections, not only at the sub-regional level, but also at the local government level. This information is critical for future planning of facilities and services, including schools, parks, open space, and recreation and cultural facilities.

The scale of development approved in the north-western sub-region is excessive. No strategic planning has been carried out to identify the economic impact on the Sydney region of transforming the Business Parks at Macquarie Park and North Ryde to mixed land use centres with 15,000 new dwelling units. Is a road tunnel the best option? What will be the impact of bringing 5,000 extra vehicles into this critical economic area every day? What of the health impacts of the proposal?

Again, the Alliance requests that the NSW Government impose a moratorium on all development approvals in the North-West sub-region and commit to an independent inquiry into planning approvals in the sub-region since March 2011.

Please contact the Alliance to further discuss the issues that have been raised above.

Jennie Minifie

on behalf of Ryde Community Alliance.