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Submission opposing NorthConnex Modification 3 to condition E 11.

The approval conditions with an allowed VOC concentration of 1mg per cubic metre were the subject of extensive public consultation and debate. To now amend the conditions by merely claiming that the original standards were a typographic error makes a mockery of the planning process. Which other standard might be worsened by 400% on the same pretext over future years?

The tunnel has no systems to trap or contain pollutants arising from the traffic, the ventilation plan is merely to pump the air pollution over the surrounding suburbs either at the ends of the tunnel or via the two ventilation shafts. NSW is making no progress on improvements to the burden of air pollution from vehicle exhaust.

- There is a smokey vehicle reporting system that only sends warning notices.
- There is no strategy to remove old and highly polluting vehicles from the roads.
- There is no strategy to encourage the uptake of electric vehicles.
- There is a plan to improve the quality of fuel sold in Australia but it does not commence until 2027.

Specific features that make this tunnel dangerous to users and local residents include

- There is no strategy to block highly polluting vehicles from entering the tunnel.
- The tunnel operations plan does not include blocking vehicle entry at times of dangerously poor air quality.
- There is no mechanism to enforce anti idling advice if traffic is stopped in the tunnel.
- There is no in tunnel air standard for PM2.5, which is the air pollutant with the worst health effects.

Evidence presented in the form of a letter dated 28-sept 2015 describing the results of dispersion modelling does not establish the safety of the 4mg/m<sup>3</sup> level, as it does not mention which receptor locations are reported, nor does it establish the validity of the criterion values used.