Submission in response to NorthConnex (M1-M2) Project – Modification

MOD 3 - ventilation outlet limit

Application Number: SSI-6136-Mod-3

I **STRONGLY OBJECT** to the modification request by Roads and Maritime Services (RMS) to amend Condition of Approval E-11 – Ventilation Outlets – Limits. Namely, the request by RMS to modify the approved Volatile Organic Compound (VOC) ventilation outlet limit from 1mg/m³ to 4 mg/m³.

I live directly opposite NorthConnex's Northern Ventilation Facility and I am extremely concerned about the VOC outlet limit modification request. There are a number of points I would like to make.

First, the increased level of VOCs from 1mg/m³ to 4mg/m³ will significantly increase the concentrations of emissions from the Northern Ventilation Facility, which is just across the road and only metres away from my family's house, directly endangering the health of my family and a densely populated residential area in Wahroonga, where over 9,000 school children will be exposed, as well as multiple aged care facilities, hospitals, businesses and homes.

I am very concerned that the multiple large-scale research studies show that the impacts of air pollutants on health are serious and potentially life threatening. 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 air pollutants have prothrombotic and inflammatory effects on humans which cause the above health problems. Specifically, many of the VOCs, including benzene and formaldehyde from vehicle exhaust, are classified as Group 1 carcinogens to humans (IARC 2009). There is currently inconsistent evidence to indicate there is a threshold below which exposure to ozone is not associated with adverse health effects.

In addition, our pleas for filtration to be installed in the NorthConnex Northern Ventilation Facility have continually been ignored by the NSW Government. It is important to note that the Final Report of the NSW Parliament Legislative Council Public Accountability Committee inquiry on *The Impact of the WestConnex Project* stated (on page 63) that "the committee is of the view that filtration should be included during the construction phase" and is followed with:

Recommendation 13

That the NSW Government install, on all current and future motorway tunnels, filtration systems in order to reduce the level of pollutants emitted from ventilation stacks.

Despite this recommendation, the NSW Government has continued to refuse to install a filtration system in the NorthConnex Northern Ventilation Facility, putting my family and the Wahroonga community's health at direct risk.

If the request to modify the approved VOC ventilation outlet limit from 1mg/m³ to 4 mg/m³ is approved, the increased levels of VOCs as well as the lack of filtration will be endangering the health of my family and the Wahroonga community even further. A filtration system <u>must</u> be installed in the NorthConnex

Northern Ventilation Facility. There also needs to be more and better monitoring of the air quality around the Northern Ventilation Facility, preferably on Woonona Avenue North, to obtain more accurate data on emissions. The NSW Government has no way of ensuring our health will not be negatively impacted by the lack of filtration and the request to increase the VOC ventilation outlet limit.

I also note the inadequate dialogue and lack of detailed explanation to the community from RMS and NSW Health. The mere single sentence email response from Richard Broome of NSW Health deferring to the same AECOM modelling that the EPA and RMS have referred to is, in my view, an unsatisfactory response to such a serious health-related matter. NSW Health does not appear to be taking the health of my family and the community surrounding the Northern Ventilation Facility seriously. The EPA and NSW Health should be conducting their own independent research and modelling to properly measure impacts to air quality and health rather than noting the same AECOM modelling as RMS.

Furthermore, I note the lack of consultation and short exhibition/submission period for this modification request. Neither RMS nor NorthConnex made any effort to contact, inform or consult residents living in close proximity of Northern Ventilation Facility directly in relation to this modification request. The exhibition/submission period of 14 days is a very short window for a modification request that has potentially serious consequences for the residents and community surrounding the Northern Ventilation Facility.

Finally, to address my serious concerns for my health, my family's health and the Wahroonga community's health, I request that the following actions be undertaken.

- 1. Due to the significant health concerns across the community, I request that the NSW Department of Planning, Industry and Environment does <u>NOT</u> approve of the RMS request to modify the approved VOC ventilation outlet limit from 1mg/m³ to 4 mg/m³.
- 2. The NSW Government installs a filtration system in the NorthConnex Northern Ventilation Facility as per Recommendation 13 of the Final Report of the NSW Parliament Legislative Council Public Accountability Committee inquiry on *The Impact of the WestConnex Project*.
- 3. The NSW Government conduct more and better monitoring of the air quality in the direct area around the Northern Ventilation Facility, preferably on Woonona Avenue North, to obtain more accurate data on emissions.
- 4. The exhibition/submission period be extended, to enable public consultations on the VOC outlet limit modification request given the potential serious negative health impacts.