Director – Transport Assessments
Major Projects Team
NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Re: Submission in response to State Significant Infrastructure Modification SSI-6136-Mod-3 – Modification to NorthConnex Ventilation Outlet Limit

Dear Sir.

We are a group of parents of students currently attending Abbotsleigh School for Girls (Abbotsleigh).

We strongly object to the modification request by the Roads and Maritime Service (RMS) to amend Condition of Approval E11 to raise the Volatile Organic Compound (VOC) limit from 1mg/m3 to 4 mg/m3. This objection is raised as we strongly believe that:

- 1. the health impacts of this modification on our school and the local community has not been adequately considered; and
- 2. the increase in air pollution within close proximity to our children and for potentially extended periods of exposure will result in short-term and long-term health impacts.

Abbotsleigh's Early Leaning Centre and Junior School is located at 22 Woonona Avenue, Wahroonga, and is approximately 500 metres from the NorthConnex northern ventilation outlet. The Early Leaning Centre and Junior School has approximately 600 students from Pre-School to Year 6 and with a range of ages from 0 to 12 years.

Abbotsleigh's Senior School is located at the corner of Pacific Highway and Ada Avenue, Wahroonga, and is approximately 1 km from the NorthConnex northern ventilation outlet. Approximately 900 students attend the Senior School from Years 7 to 12.

In additional to Abbotsleigh, other schools are located within close proximity of the NorthConnex northern ventilation outlet. These include Wahroonga Preparatory School, St Lucy's School, Knox Grammar Preparatory School, Prouille Catholic School, St Edmund's School for Blind & Visually Impaired, Wahroonga Public School, Knox Grammar School, Waitara Public School and St Leo's Catholic College. The NorthConnex northern ventilation outlet is also within close proximity to the residential areas of Wahroonga and Waitara, and a number of aged care facilities.

We believe that the decision to increase the level of VOC from 1mg/m3 to 4mg/m3 will put the health of our children and the local community at risk. Young children and the elderly are most susceptible to developing asthma. A more serious concern is the development of lung/respiratory diseases and cancer from the carcinogenic substances found in VOC.

It is our opinion that the proposed VOC emission level of 4mg/m3 is above the acceptable levels in the air we breathe, as shown in the table below:¹

¹ Source from Tecam Group website https://www.tecamgroup.com/acceptable-voc-levels/?fbclid=lwAR32kxPBcGMCsfsteREOwHOj9lgvSH-jBuGx2oyoqSclhlf8gxV5Vtqp5Es

TVOC Level mg/m3 Level of Concern

Less than 0.3 mg/m3 Low

0.3 to 0.5 mg/m3 Acceptable
0.5 to 1 mg/m3 Marginal
1 to 3 mg/m3 High

A VOC emission level of 4mg/m3 is considered exceeding high level and is in contradiction to the RMS claims that it is within the acceptable level. High levels of VOC are harmful. Exposure to VOC can cause eye, nose and throat irritation, as well as upper respiratory infections, nausea, allergic reactions and headaches etc. It can also aggravate existing respiratory diseases such as bronchitis and pneumonia. Long-term exposure to outdoor air pollution can cause chronic respiratory diseases, lung cancer, heart disease, as well as acute respiratory infections in children and the elderly.

We also believe that there has been inadequate dialogue and consultation by RMS with the local community, including the parents of children attending local schools about the impact of the modification. Many parents are not aware of this sudden modification request and we consider that the limited time allowed for submissions is unacceptable.

We request that the NSW Department of Planning, Industry and Environment undertakes the following actions:

- 1. withholds approval of State Significant Infrastructure Modification SSI-6136;
- mandates that RMS installs filtration systems at each NorthConnex ventilation outlet to reduce VOC emission into the air in accordance with Recommendation 13 of the NSW Parliament Legislative Council Public Accountability Committee Report on the Impact of the WestConnex Project dated December 2018 and noting that filtration at tunnels is an international standard; and
- 3. mandates the installation of air monitoring devices by RMS within Abbotsleigh's school grounds as offered by Mr Tim Parker, RMS Project Director.²

All the people signing this submission have not made any political donations in the last two years.

Yours sincerely,

The Parents of Abbotsleigh

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² Letter from Abbotsleigh School Headmistress Judith Poole to Department of Planning & Environment dated 11 September 2014

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