

12 September 2019

Director – Transport Assessments
Major Projects Team
NSW Department of Planning, Industry and Environment
Application Number: SSI-6136-MOD3
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 on the basis of the following:

1. the adverse impacts of this modification on our school, a sensitive receptor, has not been adequately considered; and
2. the increasing of air pollution within close proximity to our children and for potentially extended periods will result in short-term and long-term health impacts.

Abbotsleigh's Early Learning Centre and Junior School is located at 22 Woonona Avenue, Wahroonga, and is approximately 500 metres from the NorthConnex northern ventilation outlet. The Early Learning 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 within 1 km of the NorthConnex northern ventilation outlet. Approximately 600 students attend the Senior School from Years 7 to 12 and with a range of ages from 12 to 18 years.

In addition 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.

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.

As evidenced in the below chart, the proposed VOC emission level of 4mg/m³ is above the acceptable levels in the air we breathe:¹

¹ information found from Tecam Group website

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

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 to peoples' health. 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. Regarding long-term exposure to outdoor air pollution, it can cause chronic respiratory diseases, lung cancer, heart disease, as well as acute respiratory infections in the case of children.

We 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 also unacceptable.

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

1. withhold approval of State Significant Infrastructure Modification SSI-6136;
2. mandates the installation of filltration at ventilation outlets by RMS to reduce VOC emission into the air, noting that filtration at tunnels is an international standard and is Recommendation 13 in the December 2018 NSW Parliament Legislative Council Public Accountability Committee Report on the Impact of the WestConnex Project;
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

None of the people signing this submission have not made any political donations in the previous two years.

Yours sincerely,

Katrina Chu
0414928810

The Parents of Abbotsleigh

<https://www.tecamgroup.com/acceptable-voc-levels/?fbclid=IwAR32kxPBcGMCsfsteREOwHOj9IgvSH-jBuGx2oyoqScIhlf8gxV5Vtqp5Es>

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