

12 September 2019

Director – Transport Assessments  
Major Projects Team  
NSW Department of Planning, Industry and Environment  
Application Number: SSI 6136 MOD 3  
GPO Box 39  
SYDNEY NSW 2001

To Whom It May Concern

I would like to object to the following issue:

**Significant Infrastructure Modification Request for NorthConnex (M1-M2) Project –  
Modification SSI 6136 MOD 3**

I object to the modification request by RMS to amend the condition of approval E-11 – Ventilation Outlets-Limits. This is because the approved Volatile Organic Compound (VOC) limit is being increased from 1mg/m<sup>3</sup> to 4 mg/m<sup>3</sup>.

I live in Wahroonga and find that the risks on short-term and long-term health completely unreasonable if the limits are raised on acceptable pollution.

Global studies on air pollution have previously demonstrated that placing an UNFILTERED ventilation can lead to numerous adverse health effects. Placing the stack within a dense residential area such as Wahroonga, which is a highly populated school zone with over 9,300 school students, is a recipe for disaster. Further, increasing the tolerance level of VOC emissions, will lead to a greater level of these adverse health effects. This represents an unacceptable risk to Wahroonga residents, in particular older adults and our very young children. Most of the children attending schools in Wahroonga are at preschool and primary school. How can the Government sacrifice their health?

The previous multiple, large-scale research studies around the world have conclusively proven that VOCs are linked with adverse health effects. These effects include increased asthma, an increased risk of lung cancer, increased death from heart disease, stroke, poor lung growth in children, 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). When VOCs and nitrogen oxide (NO<sub>x</sub>) react in the presence of sunlight, ozone is formed. In the short-term, exposure to ozone can result in reduced lung function and exacerbation of asthma and chronic respiratory diseases, as well as irritation and inflammation of eyes, nose, throat and lower airways. In the long-term, as well as causing cancer, there is a growing body of evidence to support that exposure to ozone increases death from respiratory and cardiovascular causes. There is currently inconsistent evidence to indicate there is a threshold below which exposure to ozone is not associated with adverse health effects.

International air pollution experts state that there is no safety threshold to the amount of air pollution causing health impacts, hence there is no “safe level”.

I also submitted an objection to the original EIS for the NorthConnex project back in 2014 as there were various problems there.

Namely, the plan to place an UNFILTERED ventilation stack within the Wahroonga residential area where there are also over 9,300 students attending 23 schools (most primary schools and preschools). Also, there are various hospitals and nursing homes within the area.

Now, the Wahroonga community is finding out that not only will the ventilation stack continue to be UNFILTERED, there is a proposal to increase the tolerance level of VOC particulate matter.

***There has to be a point in this project where the health of our population is more important than saving money.***

***Please hold RMS to the tunnel pollution limits that it originally promised. Also, there should be adequate monitoring of air quality in the tunnel.***

To address these issues, I request that the following actions are undertaken:

1. Due to the significant health concerns that will occur in the community, I request the Department of Planning does NOT approve of the proposed modifications; AND
2. The ventilation outlet emissions are filtered before release into the air, as per Recommendation 13 in the December 2018 NSW Parliament Legislative Council Public Accountability Committee Report on the Impact of the WestConnex Project.

I have not made any political donations in the previous two years.

Regards

Nigel Pickford  
9 Cleveland Street  
Wahroonga NSW 2076