

Attention: Planner

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RE: Modification No. 1 to MP10_0148 Mixed use redevelopment of 150 Epping Road, Lane Cove West

The application by the proponents proposes to modify the approved development to include:

1. A new child-care centre for approximately 85 children.
2. Deletion of 800sqm of commercial floor space and replacement with a 650sqm child-care centre.

My submission is to again draw attention to the fact that this development-complex is approximately 250 metres from the *unfiltered* Western Stack of the Lane Cove Traffic Tunnel and measures MUST be adopted to protect children in the proposed child-care centre from the adverse health impacts of highly toxic and proven carcinogenic exhausts from the Western Stack coupled with similar pollutants from the busy Epping Road.

Summary comments:

(a) This submission will NOT repeat the details provided in the attached Submission of Objection which was lodged in August, 2011. Furthermore, the Planning Reviewer is reminded that a Federal Senate Committee is about to release its inquiry into '*The Health Effects of Air Pollution in Australia*'. See link:
http://www.aph.gov.au/parliamentary_business/committees/senate_committees?url=clac_ctte/air_quality/index.htm

Noteworthy are some 162 submissions (and transcripts from interviews) including those from the various government/medical/research organizations whose submissions (with reference numbers) are for example:

4. Doctors for the Environment Australia Inc. ([PDF 981KB](#))
27. Environment Victoria ([PDF 132KB](#))
29. Centre for Air quality and health Research and evaluation (CAR) ([PDF 435KB](#))
35. Residents Against Polluting Stacks Inc ([PDF 357KB](#))
48. CSIRO ([PDF 439KB](#))

- 50. Asthma Foundation NSW ([PDF 365KB](#))
- 53. International Laboratory for Air Quality and Health (ILAQH), Queensland University of Technology ([PDF 130KB](#))
- 80. NSW Environment Protection Authority ([PDF 2146KB](#))
Supplementary Submission([PDF 123KB](#))
- 86. Dr. Raymond Kearney ([PDF 1291KB](#))
- 114. Australian Medical Association ([PDF 254KB](#))
- 162. Standards Australia ([PDF 1411KB](#))

What is evident in these submissions is the current standards for air quality DO NOT relate to health impacts or to health risk. The report of the Senate Committee is about to be released and was due on the 12th August, 2013.

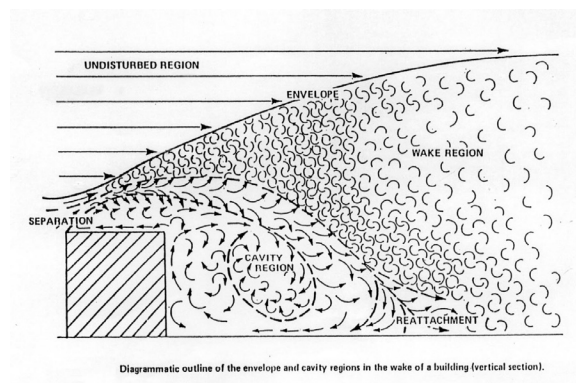
(b) Also noteworthy is that In June, 2012, the WHO declared **diesel fumes** to be a **Level-1 Human Carcinogen** i.e. proven evidence of carcinogenicity in human beings.
http://www.iarc.fr/en/mediacentre/pr/2012/pdfs/pr213_E.pdf

(c) You are reminded that NSW Planning by its '*Minister's Conditions of Approval*' gave authority for the annual discharge of pollution from both unfiltered stacks of the Lane Cove Tunnel being:

PM10 particles (excludes fine and ultrafine toxic particles)..... 14 TONNES

Highly toxic Volatile Organic Chemicals (VOC's) e.g., benzene..... 154 TONNES

(d) Effect of 'downwash' on plume from exhaust stack by buildings in the development complex.



For site proposal of child-care centre see p5 of following link:

https://majorprojects.affinitylive.com/public/86f07b6dc575998412e7c12fd9fac04b/20130529taa_r1_child%20care%20acoustic%20assessment.pdf

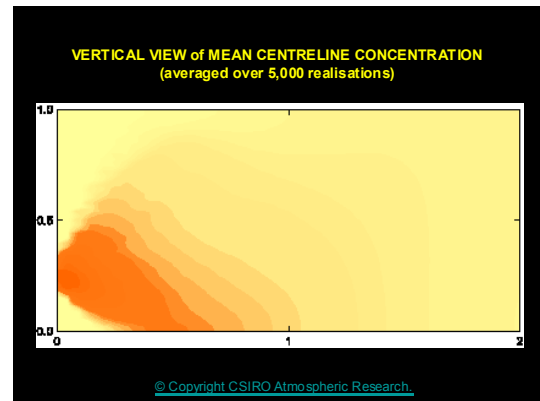
The concern is that adjacent buildings beside the child-care centre and near to the Western Stack will cause 'down-wash' of plume pollutants and expose vulnerable young children to the toxic effects of pollutants from both the stack and from the traffic on Epping Road. Also see live video of a plume trajectory at link:

<http://www.cmar.csiro.au/airquality/meander/index.html> Click on 'start'.

The RHS panel shows fallout of heavy particles in close proximity to a stack while light/fine particles remain in the air for days/weeks and travel 100's to 1000's of kms.

(e) Measures must be adopted in this modified development to include a child-care centre outdoors to eliminate such health risks, keeping in mind also that young children are more likely to place contaminated objects in their mouth. The ultimate solution is to install filtration in the stack.

(f) The relationship between air pollution, death and disease has been studied for decades, leading to the consistent conclusion that combustion of diesel and petrol is among the most toxic sources of emissions today (USA Clean Air Task Force Report, Feb. '05) viewed at the link: <http://www.catf.us/publications/view.php?id=83>



See also NH&MRC Report (2008) on Air Quality Around Tunnels – link: <http://www.nhmrc.gov.au/guidelines/publications/eh42>

These exhausts contain numerous dangerous compounds, ranging from respiratory irritants to carcinogens including a host of air toxics, particulate matter, carbon monoxide and nitrogen oxides.

The very fine particles adsorb toxic gases and liquids onto their surfaces. On a weight basis, a billion ultra-fine particles are about equivalent to one coarse particle 10 micrometres in diameter (PM10), but have 1000 times the surface area. The fine particles are mainly soluble and penetrate deep into the lungs. Health research indicates that the invisible exhaust may be the most dangerous of all. Technology exists right now to clean up emissions from these engines and to remove such toxics from road tunnels *by filtration*.

Children are more susceptible than adults (except the elderly) to the adverse effects of air pollution because:

- Children are more active and breathe more rapidly.
- They have more lung surface area compared to their body weight and inhale more air kgm-for-kgm than adults.
- They have higher lung volume to body size, higher respiration rates and spend more active time in the polluted outdoor environment.
- When exposed to fine particles, children have slowed lung function growth, increased emergency room visits, increased incidence of asthma, bronchitis and crib death (CATF Report, Feb. '05).

Conclusion:

In the knowledge that toxic/carcinogenic pollutants are discharged into the atmosphere from the adjacent western unfiltered stack of the Lane Cove Tunnel, the presence of buildings in the subject proposal will cause 'downwash' of such pollution plumes (dependent on weather conditions). Measures **MUST** be adopted to protect children, for whom up to 85 places are planned in the proposed child-care centre, against additive exposure to such toxic pollution.

NOTE: This matter has been reported by me to Professor Wayne Smith, Director of Environmental Health, NSW Department of Health. Professor Smith who is a member of the NSW Health's Expert Committee on Air Pollution was also interviewed by the Senate Committee of Inquiry on Health Impacts of Air Pollution. The transcript is available at link:

http://www.aph.gov.au/parliamentary_business/committees/senate_committees?url=clac_ctte/air_quality/index.htm