

North East Link Non-Compliances:

NEL Air Quality PM10 & PM2.5 Fine Air Particles Health Impact

1. The **State Environmental Protection Policy (SEPP AQM)** has been ignored in the EES. No NEL air pollution impact study has been done for the Eastern Freeway component of NEL. Councils (Banyule, Boroondara, Whitehorse) engaged an AQ expert Dr Iain Cowan, who told the IAC Panel a proper SEPP study needs to be done for surface roads. **Action: Our EPA must do a proper SEPP impact study now to determine legislative compliance. That is what they are there for.**
2. The EES identifies that NEL **PM10 & PM 2.5 fine particle pollution** will increase x 2.5 times on the Eastern Freeway. Breaches of SEPP limits will certainly occur at a time when **1700 deaths per year are caused by vehicle pollution vs 1300 from road accidents.**
3. EPA AQ study on Table 108 in the **EES muddies the water by averaging yearly data** and including bushfires and dust storms which contradicts SEPP process. It's a bit like saying the predicted summer average temperature is forecast to be 25 deg, so bushfires won't be a problem. We know it's the "peaks" that cause the problem, not the averages. The same applies to air quality.
4. **Cleaner technology & electric cars** may help AQ, but trucks will be running on deisel for a long time to come. Deisel fuel is the biggest emitter of fine particles. The EES says particle pollution will increase x 2.5 times existing. Cleaner technology does not eliminate brakes and tyre dust resulting in secondary particles. Cleaner technology requires maintenance to be effective. If a car owner chooses to ignore maintenance then filtration technology can be ineffective. **Action: A means of controlling this situation is to ban diesel vehicles on smog alert days, which may number 10-20 days per year.**

NEL Road Traffic Noise

5. Noise protection at the **upper levels of residences are excluded.**
6. **Daytime noise limits** of 63 dB(A) L10 18 hr will be breached at 159 properties to save money. Noise protection for the **night time** will be 58 dB(A) at GFL, despite the fact that WHO 2009 NEL Scoping Requirements recommends 40 dB for night time at the upper level. Best practice Swiss curved and acoustic noise walls have been ignored for the NEL project. **Action: See Attached photos of Swiss acoustic noise walls (best for roadside) and Modular Acoustic Walls (may be best for house boundaries or fences). Modular Walls Jack Rolfe 02 95406602. Ball park cost to supply & erect a 6m high acoustic wall is approximately \$300 per m2.**
7. **NSW, WA, SA all have night traffic noise policy 50 dB(A).** Planning Minister Mr Wynne in his EES assessment (page 65 par 6) told EPA to produce a night noise policy for roads. EPA refuse. At some point in time Victoria will have a night road traffic noise policy in line with other states. **Note: The cost to retro-fit and fix up the non-compliant roads mess will be massive for the Victoria when we do have a night road traffic noise policy assumed to be 50 dB(A).**
8. There is an **existing nuisance on the Eastern Freeway** now if NSW, WA & SA night noise policy applied in Vic. Night noise monitoring at my residence in 2013 was 53 dB(A) Leq.

Jacinta Allan advises that truck numbers will increase to 2400 per night (10 pm to 6 am) with NEL. **Action:** *A solution to the air and noise problem on the Eastern Freeway would be, leave it as it is and encapsulate with above ground tunnels. The roof of tunnel could have solar panels that generate the projects' own power. The NEL project is a toll road, so why is money a problem where health and environment are concerned? This will also help carbon neutral 2050 target be achieved. Another part of the solution would be to slow trucks down to 80 kph at night 10pm to 6am.*

9. Existing **noise monitoring has not been done within 100 m of overpasses** on the Eastern Freeway to date. This is a requirement of EPR NV 1(b). NELP are trying to exclude overpasses on the Eastern Freeway from the noise impact of NEL.

PFAS Contaminated Waste

The NELP Submission to NEL Inquiry & Advisory Committee says on page 115, Clause 452 that PFAS soil waste can be disposed of locally. No quantities of PFAS soil waste have been nominated. The NEL Minister's Assessment of Environmental Effects page 72, par 2, says PFAS groundwater will be encountered at Bulleen Drive-In site and Watsonia Railway Station and the fuel service station at Yallambie and Greensborough Roads. These have not been quantified nor have disposal sites been identified.

Greenhouse Emissions

The NEL EES states that **greenhouse emissions** from NEL surface roads will increase overall but cleaner technology may negate. A significant **loss of greenspace** will occur near NEL. 26,000 mature trees will be replaced by small young trees.

Templestowe Road

Widening and other proposed rezoning developments adjacent have had no EES done. Most of this area is flood plain on or near environmentally sensitive parkland and endangered species. Rezoning of industrial land to residential is proposed. Residential development of Yarra Valley Country Club is proposed.

Environmental Performance Requirements (EPR's)

EPR's are being breached at Borlase Reserve during early works. Borlase will be the tunnel boring site for several years. Complaints to NELP about noise and dust are ignored. The Independent Environmental Auditor (IEA) reports are done 6 monthly and are confidential. This is a system that allows for blatant cheating of standards. There is no complaints process. FOI site noise data shows night noise measures to be as high as 83.2 dB(A). EPR NV 3 Criteria states "inaudible inside a habitable room". Residents have been temporarily removed from homes. A controlled compound environment is required to control noise and hazardous dust.

Memorandum of Understanding

Councils each signed a Memorandum of Understanding with the North East Link Authority which will severely limit the ability of council to communicate on "final" design details of the project with their respective communities. Final design will be done in secrecy and exempt from EES.

Suburban Rail Loop (SRL)

This current SRL proposal is to be built in stages over a thirty year period. The NEL \$16 bil would be better spent building all stages concurrently and deliver the finished project within 10 years.

Barry Watson 8/2/2021