



**CLIFTON HILL PRIMARY SCHOOL**  
**SCHOOL COUNCIL**  
**SUBMISSION ON THE EAST WEST LINK**



Proposed tunnel ventilation station located corner Gold St and Alexandra Pde Clifton Hill  
< 100m from Clifton Hill Primary School (Gold St, Clifton Hill)

**This submission addresses public hearing matter (B): Whether the impacts of the project on land use and infrastructure in its immediate environs, including on housing, recreation and community facilities, have been appropriately addressed. In particular, we discuss the needs of staff and students at Clifton Hill Primary School.**

7 December 2013

## BACKGROUND

Clifton Hill Primary School is located at 185 Gold Street, Clifton Hill. It services 407 families, with a total of 575 enrolled students, ranging in age from 4 – 12 years. The school catchment area is in the City of Yarra, but many students travel to the school from outside the zone (with a significant proportion from the City of Darebin).

The tunnel ventilation system was originally proposed at the corner of Gold Street and Alexandra Parade, Clifton Hill, which is one block (or between 80 - 100 metres) from the school site. The Comprehensive Impact Statement (CIS) now says “The exact location of the structures would be determined by the contractor” (ch 11, p.10). The ventilation systems are a cause for serious concern, due to their potential impact on air quality at Clifton Hill Primary School. We do not understand why such an important decision would be left to the contractor.

Many members of the school community are concerned about the project (see article in *The Age* newspaper at **Attachment A**). As a result, the School Council conducted an online survey of parents in Term 3 this year. Approximately half the parent body participated and this submission reflects their responses. The following is a summary of the key issues arising from the survey.

## ISSUES

- **The majority (76%) of respondents oppose the construction of the tunnel.**
- **We seek assurances that the construction will minimize disruption to the school** (98% of respondents), including keeping Wellington St open. We seek an independent assessment quantifying the amount and impact of noise and dust on the community and school children specifically referring to Wellington St.
- **We request independent air quality monitoring at the school**, beginning as soon as possible and continuing through the project (97% of respondents).
- **We advocate moving the emissions tower further East** (90% of respondents). If this option is rejected we request an air quality modelling report showing how much difference it would have made to the air quality at CHPS.
- **We advocate moving the tunnel entrance further East** (supported by 82%).
- **30% of respondents said they would consider moving their children to another school if the project goes ahead**

Clifton Hill Primary School is one of Melbourne’s most popular primary schools, but our parent survey shows serious concerns about the impact of the East West Link. Hence we need urgent, quantified and scientifically supported assurances that the project design and implementation will not have a deleterious effect on staff and students’ health, wellbeing, or school access.

## **ADEQUATELY ADDRESSING THE NEEDS OF CLIFTON HILL PRIMARY SCHOOL<sup>1</sup>**

The CIS “Summary of key assets: land use and community facilities” in our precinct does not even mention Clifton Hill Primary School (table 5.3 in chapter 5 of the CIS). The only specific mention of Clifton Hill Primary School is in Chapter 16, which discusses the closure of the Gold Street crossing of Alexandra Parade. (“A school” in our area is mentioned in the chapter on Heritage buildings.) No schools at all are mentioned in the chapters on Air quality (11), Noise and vibration (12), environmental management (17) or on meeting their obligations (18).

The rest of this submission expands upon the needs identified in our survey.

### **The Tunnel Ventilation System**

The majority of respondents to the school survey oppose the construction of the tunnel. However, if the East West Link were constructed, 90% of respondents to the survey supported moving the tunnel ventilation system planned for the corner of Gold Street and Alexandra Parade, to a location further east, away from residential and school areas. The current CIS statement that “The exact location of the structures would be determined by the contractor” (ch 11, p.10) does not alleviate this concern. Nor does the weak requirement that “an additional air quality assessment would be required to prove that the performance requirements to policy levels would be met.” We seek a firm undertaking that pollution levels will be carefully modelled in advance, monitored after construction, and that any increase in pollution levels as a result of the project will be properly addressed.

The School Council requests more detail on the design and construction of the tunnel ventilation stack, including

- the height of the stack;
- visibility from the school;
- a description of any filters that will be used; and
- a model of how this will perform in the event of an incident such as the Burnley tunnel fire

Leaving this to the contractor does not adequately address the needs of the Clifton Hill Primary School community.

The School Council strongly recommends that various locations for the tunnel ventilation system be fully costed and investigated. Costs include the financial cost of relocation and

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<sup>1</sup> Neither the school nor school council professes expert knowledge in these areas and the information provided has not been verified by the school or School Council.

the health and environmental costs to the community (in particular, staff and children at Clifton Hill Primary School). An air quality modelling report should also form part of this.

The School Council requests that this cost benefit analysis of various locations for the tunnel ventilation system be canvassed as part of the public consultation process, that the report be provided to the school community, and that the needs of Clifton Hill Primary School be considered in the final decision.

### **Air Quality Monitoring**

The School Council requests independent air quality monitoring at Clifton Hill Primary School to commence as soon as possible so that a baseline level can be established. If construction commences, monitoring should continue through the construction period and beyond.

### **Health Impacts**

The school community (97% of respondents) is extremely concerned about the possible effects of emissions from the proposed Gold Street tunnel ventilation system on the health of staff and students at Clifton Hill Primary School. Several students and staff members have respiratory problems including asthma, and the School Council is particularly concerned to understand projected health impacts upon the general school population and those with illnesses that make them particularly vulnerable to the effects of air pollution.

The East West Link (Tunnels) Fact Sheet states that '[v]entilation systems are designed to meet Environment Protection Authority [EPA] standards' and notes that the recorded carbon monoxide levels for East Link were significant lower than the level permitted by the EPA. The implication is that the emissions from the East Link are at safe levels and that emissions from the East West Link will also be safe. In fact, East Link emissions have on occasion exceeded EPA sanctioned levels.

There is growing consensus within the medical community that there is no 'safe' level for particles under 10 microns in diameter (PM 10) and fine particles, that is particles measuring 2.5 microns or less (PM 2.5). There is a linear relationship between concentration and health impacts. Diesel engine exhaust (a large contributor to PM 10 and PM 2.5) was recently classified as a human carcinogen by the International Agency for Research on Cancer (IARC). The EPA also considers diesel to be a carcinogen.<sup>2</sup> The EPA Guidelines and Australian Standards are not keeping pace with medical evidence which shows a causal relationship between exposure to diesel engine exhaust and lung cancer<sup>3</sup> and that any increase in exposure to air pollution increases the risk of lung cancer.<sup>4</sup>

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<sup>2</sup> Environment Protection Authority (Victoria) *Diesel Exhaust, Air Quality and Health* (May 2002)

<sup>3</sup> [www.thelancet.com/oncology Vol 13 July 2012](http://www.thelancet.com/oncology/Vol_13_July_2012)

<sup>4</sup> [www.thelancet.com/oncology Vol 14 August 2013-09-26](http://www.thelancet.com/oncology/Vol_14_August_2013-09-26)

It is not sufficient for emission levels to be deemed safe because they are likely to fall within EPA Guidelines or because they are consistent with emissions from other Australian or international tunnels. The existence of the EPA Guidelines and the fact that emission levels are consistent with other tunnels will clearly not protect the Victorian Government from legal action in the event that harm is caused by these emissions. The Victorian Government is responsible for ensuring that it fulfils its duty of care to those that may reasonably foreseeably be harmed by its actions. If harm is caused, the fact that the Victorian Government has been put on notice of these risks (through this submissions and no doubt through others) will also be relevant in determining that issue of reasonable foreseeability.

**The Gold St community seeks assurance from the Linking Melbourne authority that the concentration of small diameter particulate matter (PM10 and PM2.5) at the school as a result of the ventilation stack will not be higher than current levels.**

### **The Impact of Construction**

#### **Access to the School**

Students must be able to continue to access the school safely and without undue delay. Access from the south via Wellington St is crucial for families who live south of Alexandra Parade. We received verbal assurance from the Linking Melbourne authority that Wellington St will remain open across Alexandra Parade throughout the project. However, this assurance does not seem to be reiterated in the CIS, apart from a vague statement that families affected by the closure of Gold St will “likely have to detour via Wellington St” (ch 16, p. 12). A large fraction of Clifton Hill Primary School students live south of Alexandra Parade, so it is essential that Wellington St remains open for pedestrian and vehicle traffic.

#### **Noise, dust and vibrations**

The School Council requests an independent assessment quantifying the amount and impact of vibrations, noise and pollutants on Clifton Hill Primary School, together with a remediation plan to minimise the effects of these pollutants. The School Council seeks written assurances that the noise, dust and vibration of construction activity will not affect the students or staff at the school.

#### **The Community**

Clifton Hill Primary School has strong connections to the local community and the school site is used after hours, on weekends and during holiday periods by several community groups including a German school, school holiday programme, before and after school care and art, dance, health and sporting programmes. Clifton Hill Primary School must also be accessible to those community groups that use the site outside school hours and during holiday periods.

## **CLIFTON HILL PRIMARY SCHOOL**

Founded in 1874, Clifton Hill Primary School has provided outstanding education to generations of children through depression, wartime and successive waves of immigration. Today the school is considered one of the best primary schools in Victoria as a high performer in NAPLAN and a critical contributor to the local community through public education and community works.

### **Contact**

The Principal of Clifton Hill Primary School, Mr Geoff Warren and Acting Principal Ms Megan Smith may be contacted to discuss this submission and to make arrangements for ongoing consultation on issues raised in this submission. Their contact details are:

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## East-west link prompts fears for primary school

Henrietta Cook

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Parents and teachers fear Clifton Hill Primary School could be forced to relocate during construction of the east-west link road tunnel due to noise, ground vibrations and pollution.

They have also raised concerns about the tunnel's ventilation station, which could be located a block away from the historic school.

Principal Geoffrey Warren said he was worried the school would have to move during the project's construction.

"It would have a significant impact. What we don't know is if that means forever or a temporary removal."

A government spokeswoman said no school along the proposed tunnel route, including Clifton Hill Primary, would be directly impacted by the project.

“The location of the tunnel ventilation stations shown yesterday are indicative only; any impact to the schools in the area will, of course, be an important consideration in the planning process.”

She said the Linking Melbourne Authority was happy to speak with any school, and work on air quality would be part of the Comprehensive Impact Statement.

Air quality around the school could improve due to traffic, including diesel powered heavy vehicles, being moved underground, the spokeswoman said.

Mr Warren said he had received phone calls from worried parents after it was revealed on Tuesday that a ventilation station for the tunnel could be located on the corner of Gold Street and the northern side of Alexandra Parade.

"It doesn't seem to make sense for it to be in the vicinity of expensive housing areas, the elderly and schools."

An entire row of mainly commercial properties on the northern side of Alexandra Parade is set to be bulldozed – further exposing the 130-year-old school to the massive construction site.

Mr Warren said he was not consulted about the plans and had not received any information from the Education Department.

"I lament the fact there has been no consultation with the school to enable me to calm the school community. Half a dozen parents have asked me what it means for the school and will it be closed."

Melanie White, who is on the School Council and the mother of Grace, 10, and Gabriel, 8, said she was anxious about children being exposed to increased pollution.

"With these exhaust stacks we will have pollution pouring into the school yard and into the lungs of primary school children."

She said the Hoddle Street overpass could overshadow the playground or be visible from the school.

Labor MP for Richmond Richard Wynne said he had no idea where the stack would be located or what its potential health impacts would be.

"This is contemptible behaviour by a government that is riding roughshod over the community without any regard to the impacts their foolhardy project will have," he said.

*This story was found at: <http://www.theage.com.au/victoria/eastwest-link-prompts-fears-for-primary-school-20130717-2q4ar.html>*