

**SUBMISSION BY INNER WEST COUNCIL
TO SYDNEY MOTORWAY CORPORATION
ON THE WESTCONNEX STAGE 3 (M4-M5 LINK) CONCEPT DESIGN**

AUGUST 2017

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SUMMARY

This submission has been prepared by Council staff. Its preparation has been assisted by an assessment of the Concept Design and relevant background documents recently facilitated by planning/engineering firm Beca, commissioned by Council – a summary is at **Attachment 1**, whilst the assessment is at **Attachment 2**. It has also been assisted by a desktop study undertaken in early 2017 of Stage 3 mid-tunnel drive-site options by independent engineer James Holt, commissioned by Council – at **Attachment 3**. The submission has also integrated comments from specialist Council staff and feedback Council has received from residents and community groups throughout 2016-17.

Although this submission deals primarily with ‘content’ issues, the Concept Design exhibition has also raised ‘process’ issues for Council and the community. The most important of these are the document’s lack of detail and the possibility there will not be sufficient time between the close of exhibition of the Concept Design and commencement of exhibition of the Environmental Impact Statement (EIS) to allow issues raised by the former document to influence the latter.

Council’s position on the Concept Design is expressed in **three tiers**, noting that all three are inter-related. The **first-tier** position is that Council remains strongly opposed to all parts of WestConnex, including Stage 3. Council would prefer that no part of WestConnex had been planned or constructed, and the substantial funding for this project had been devoted to public transport and other demand-management (traffic reduction) options.

Council’s **second-tier** position is that it reluctantly accepts that Stages 1 and 2 are approved and under construction and seeks a redesign of Stage 3 to reduce local traffic and amenity impacts and improve transport outcomes. The first and second tier positions form the basis of Council’s ‘strategic position’ on Stage 3.

The main elements of Council’s **second-tier** position (i.e. alternative proposal) are as follows:

- *Element 1: Construct the main Stage 3 tunnel* - between Haberfield and M5 to the southeast, as Council is concerned that without this link residents around the Haberfield and St Peters interchange sites will suffer unacceptable operational traffic impacts.
- *Element 2: Relocate the St Peters Interchange & connect to Airport & Port* - move the St Peters Interchange closer to Sydney Airport and Port Botany, downgrade it to an underground junction and connect it directly to the main Stage 3 tunnel – to better connect the Airport and Port, reduce inner-urban traffic impacts and allow the St Peters Interchange site to be put to a more productive use.
- *Element 3 – Remove from the Rozelle Interchange connections to Anzac Bridge and The Crescent* - connect the main Stage 3 tunnel to Victoria Road via the Iron Cove Link and Western Harbour Tunnel (if built) - but not to adjacent surface roads City West Link, Anzac Bridge or to Johnstone Street / The Crescent. The Rozelle Interchange would be downgraded to an underground junction. Whilst this would reduce local vehicular access to WestConnex, it would also reduce local traffic and amenity impacts.
- *Element 4: Proceed with the Iron Cove Link* - connect the main Stage 3 tunnel to Victoria Road via the Iron Cove Link tunnel, with amenity, active transport and public transport improvements implemented on the surface along Victoria Road from the Iron Cove Bridge to Springside Street.
- *Element 5: Minimise traffic impacts on all local roads* - through processes such as Council’s Local Area Traffic Improvement Strategy (currently being developed), funded by the NSW Government.

- *Element 6: Improve all surface roads where traffic has been reduced by WestConnex - capitalise on opportunities for amenity and public transport improvements on all roads where traffic has been reduced, e.g. guided electric transit along Parramatta Road and Victoria Road.*
- *Element 7: Extend dedicated bus lanes across Anzac Bridge - made possible by ensuring WestConnex does connect to (and add extra traffic to) the Anzac Bridge.*
- *Element 8: Proceed with the Rozelle Rail Yards recreation area - convert the Rozelle Rail Yards (RRY) site to parkland designed in conjunction with Council and the community and delivered fully-constructed at no cost to Council, to assist with offsetting currently low levels of open space in the Rozelle area and bring benefits to the community from the project.*
- *Element 9: Implement other traffic demand-management measures - to reduce traffic growth and the need for extra road capacity.*

Council's **third-tier** position is that should Stage 3 proceed according to the Concept Design, a number of issues would need to be thoroughly assessed in the EIS. These issues would need to be resolved and/or managed by design changes and conditions of approval so that impacts on the local community are minimised and opportunities for beneficial outcomes seized wherever possible.

The main issues raised in Council's **third-tier** position (i.e. local issues that need to be addressed) are as follows:

- *Issue 1: Air quality & visual impacts from ventilation facilities - concerns about unfiltered ventilation facilities proposed for the RRY site and Victoria Road near Terry Street – the latter facility raises particular concerns due to its proximity to densely developed residential areas. All ventilation facilities must be fully filtered.*
- *Issue 2: Overall construction impacts - concerns about the full range of construction impacts – including, traffic, parking, noise and dust – around all Stage 3 construction sites;*
- *Issue 3: Particular concerns about construction impacts from mid-tunnel construction dive-sites – concerns about noise, dust and traffic impacts from the mid-tunnel construction dive-sites proposed for Darley Road, Leichhardt and Bridge Road / Parramatta Road, Annandale.*
- *Issue 4: Council does not support the construction of any of the proposed Stage 3 mid-tunnel construction dive-sites, preferring potentially lower-impact alternatives - opposition to the Darley Road and Bridge Road dive sites, with a preference for no dive sites, or a potentially lower-impact dive site option at the western end of the Rozelle Rail Yards (RRY) site.*
- *Issue 5: Continuation of construction impacts at Haberfield - concerns about continued use of existing Stage 1 works compounds at Haberfield for Stage 3, resulting in a prolonged extension of construction impacts – a particularly important issue as Haberfield residents have already endured significant impacts from the construction of Stage 1.*
- *Issue 6: Provision of truck stabling areas & management of impacts - concerns about noise, safety and amenity impacts from truck stabling on streets, and consequently a requirement that off-street stabling areas be provided prior to commencement of Stage 3 construction.*
- *Issue 7: Construction & operational traffic around the Rozelle Interchange - with consequences for residential amenity, pedestrian/cyclist safety and parking demand;*

- *Issue 8: Operational traffic impacts on Anzac Bridge & The Crescent* - particular concerns about the Rozelle Interchange feeding additional traffic onto the already congested Anzac Bridge and onto The Crescent and Johnstone Street at Annandale – these latter two streets being within densely developed residential areas.
- *Issue 9: Impact of compulsory acquisitions* - on residents and businesses along Victoria Road at Rozelle – required for construction of the Iron Cove Link tunnel portal on Victoria Road.
- *Issue 10: Need for a stronger commitment to surface road improvements* – including traffic capacity reductions and public transport improvements wherever traffic is reduced by WestConnex – in particular, along Victoria Road and Parramatta Road.
- *Issue 11: Impact of clean-up of Rozelle Rail Yards site on heritage and biodiversity* – concerns about lack of consideration of retention of rail heritage features in-situ and staging of site clearing to minimise biodiversity impacts.
- *Issue 12: Need to further improve walk/cycle connectivity across Rozelle Rail Yards site* - a greater number and improved quality of north-south walk/cycle connections is needed across City West Link and the RRY site to link the Rozelle, Lilyfield and Annandale communities, and to ensure the RRY site recreation area is readily accessible to the community. The recreation area is to be delivered at no cost to Council fully constructed.
- *Issue 13: Need for full delivery of Rozelle Rail Yards recreation area to Council* - Council expects the RRY recreation area to be delivered to Council for its ownership at no cost, and all landscaping, paths and facilities to be constructed by the NSW Government according to final masterplan designs. It is also expected that Council will be closely involved in the development of a Plan of Management for this area.
- *Issue 14: Need to consider impact on future public transport corridors* - concerns that construction of WestConnex Stage 3 and the Western Harbour Tunnel (if built) may hamper implementation of Western Metro (rail) and sever future light rail links, such as the White Bay / Balmain link.
- *Issue 15: Other local issues* - other of less-critical but nonetheless important local issues raised by Council staff, community groups and members of the community.

INTRODUCTION

This submission has been prepared by Council staff with the assistance of planning/engineering firm Beca Australia. Progress reports on development of this submission have been discussed at meetings of Council and Council's Local Representation Advisory Committee (LRAC) from May to July 2017, and comments made at those meetings have been integrated into the submission. Over that period Council has received various formal and informal comments on the Concept Design from the community – including comments made at Council's WestConnex Community Liaison Forum (WCLF) and the NSW Government's WestConnex Community Reference Group (WCRG). These comments have also been integrated into the submission, as have comments from specialist Council staff.

Key documents that have guided the development of this submission are:

- Sydney Motorway Corporation (SMC) (2017) *WestConnex M4–M5 Link Concept Design Plan*;
- Department of Planning & Environment (DP&E) (2016) *WestConnex M4-M5 Link State Significant Infrastructure Application Report (SSIAR)*;

- DP&E (2016) *Secretary's Environmental Assessment Requirements (SEARs) for Preparation of an Environmental Impact Statement (EIS) for the M4-M5 Link*;
- City of Sydney (2016) *The WestConnex Challenge, Public Summary Report and WestConnex - Alternative Proposal*;
- Beca Australia (2017) *WestConnex M4-M5 Link Concept Design Review* – review summary as facilitated by Beca for Inner West Council - at **Attachment 1**;
- Beca Australia (2017) *WestConnex M4-M5 Link Concept Design Review* – facilitated by Beca for Inner West Council - at **Attachment 2**;
- Holt, James (2017) *Assessment of M4-M5 Link Mid-Tunnel Construction Dive-Site Options* – for Inner West Council – at **Attachment 3**.

EXHIBITION PROCESS ISSUES

Although this submission deals primarily with 'content' issues, the Concept Design exhibition has also raised 'process' issues for Council and the community. In this regard, Council resolved in May 2017 that: *"Council makes urgent representations to the Minister for WestConnex in relation to the M4-M5 Link (Stage 3) of WestConnex that:*

- the Concept Design Plans issued on 12 May are causing significant concern in the Inner West community due to the general, vague and selective nature of the plans and that they should either be withdrawn or immediately augmented to address concerns identified by Council and in the Coalition Against WestConnex letter dated 22 May;*
- a firm closing date for submissions on the Concept Design Plans be set of not less than 8 weeks from the date of new or amended plans being released;*
- there be no overlap of the exhibition of the Concept Design Plans with exhibition of the EIS in order that community comments on the Design Plans are appropriately factored into the EIS, ensuring there is a proper purpose to exhibition of the Concept Design Plans; and*
- the EIS be exhibited for a period of not less than 8 weeks and, given imminent Council elections, that closing date for submissions on the EIS concludes after Council elections on 9 September to enable the newly elected Council to finalise Council's submission."*

In writing to the Minister, Council had also relayed a number of more detailed issues raised by the Coalition Against WestConnex and the broader community about difficulties they had experienced in downloading and navigating the document online. Although these technical issues have now been resolved, it reinforced Council's and the community's impression that the exhibition has not been well-planned.

Council acknowledges that a close date has now been set for the exhibition of the Concept Design and this will not overlap with exhibition of the EIS. However Council remains acutely concerned that there will not be sufficient time between the two exhibition periods to allow the assessment of Concept Design issues to influence the drafting of the EIS - compromising the EIS and signaling to the community that consultation is rushed and tokenistic. Accordingly Council would like the EIS exhibition period to commence at least four to six weeks after the close of the Concept Design exhibition, i.e. commence in early-mid September 2017. All issues raised by the Concept Design should be considered, with reference to corresponding changes to the project's design within the EIS.

Council also remains concerned about the lack of information within the Concept Design, particularly on contentious community issues. For example, lack of detail about the precise location of construction sites has led to consternation in the community about parks being used for this purpose, even where this is not actually proposed. The lack of detail also means that Council's submission is by necessity limited in its scope and raises numerous

issues (outlined below) that have not been addressed. These issues will need to be addressed in the EIS. In past months Council has written to the Minister for WestConnex and SMC's Chief Executive Officer (CEO) to raise process issues and seek further information on some of the abovementioned issues, but at this stage a satisfactory response has not been received.

COUNCIL'S FIRST-TIER POSITION: OPPOSITION TO WESTCONNEX

Council's position on Stage 3 is expressed at three levels, with each of these levels including elements and issues that are inter-related. The first-tier position is that Council continues to strongly oppose WestConnex in line with the views of the majority of Inner West Council residents (refer to Council survey described below). Council would prefer that no part of WestConnex had been planned or constructed, and the substantial funding for this project had been devoted to public transport and other demand-management (traffic reduction) options.

As Council has repeatedly argued, public transport and other traffic-reduction options (not motorways) are needed to move Sydney toward a liveable and efficient transit-oriented city, where the city's inhabitants can for the most part access jobs, services and recreational opportunities by means other than car. WestConnex will contribute to the opposite – reduced public transport patronage, induced traffic, urban sprawl, polluted air, compromised neighbourhoods and an inefficient/costly transport system that is a burden on the city's economy. WestConnex will also undermine the NSW Government's own efforts to create transit-oriented development in other parts of Sydney.

These views are not unique to Inner West Council – they are the views of the former councils that now make up Inner West Council, and are the views of other inner-Sydney councils and many planning/transport professionals and residents of inner-Sydney. In 2016 Council commissioned an independent survey of Inner West Council residents on a number of issues, including WestConnex. The survey found that almost 60% of respondents were opposed to WestConnex.

Council also notes that the Australian Auditor-General's February 2017 report on WestConnex is critical of many aspects of the project's funding and approvals process. The Auditor-General found the project had a poor business case that did not adequately consider alternative transport options, has lacked strategic oversight of its funding/approval process and appeared to be rushed to implementation.

COUNCIL'S SECOND-TIER POSITION: ALTERNATIVE PROPOSAL

Council's second-tier position is that it reluctantly accepts that Stages 1 and 2 are approved and under construction and seeks a redesign of Stage 3 to reduce local traffic and amenity impacts, improve transport outcomes and ensure that WestConnex better achieves some of its own objectives. Key elements of Council's proposal for a redesigned Stage 3 are outlined below. The fact that Inner West Council, other councils and community groups have sought to redesign WestConnex is indicative of the project's poor business case that has not adequately considered alternatives. The first and second tier positions form the basis of Council's 'strategic position' on Stage 3.

The key elements of Council's second-tier position (i.e. alternative proposal) are discussed as follows.

Element 1: Construct the main Stage 3 tunnel

Construct the main Stage 3 tunnel between Haberfield and M5 to the southeast, as Council is concerned that without this link residents around the Haberfield and St Peters interchange sites will suffer unacceptable operational traffic impacts.

A key element of Council's alternative proposal is that a modified version of the main Stage 3 tunnel would remain. Significant alterations would however be made to the Rozelle Interchange and the St Peters Interchange would be relocated. Council is concerned that without the main Stage 3 tunnel between Rozelle and St Peters, these two suburbs would suffer significant local traffic impacts. Council is also concerned that upgrading major roads such as the A3 (Homebush to Beverly Hills) could increase traffic impacts on residents outside the Inner West and City of Sydney council areas. A major aim of Council's alternative proposal is to allow traffic to travel *around* the densely developed part of inner-Sydney, but not *through* it.

Element 2: Relocate the St Peters Interchange to connect to Airport & Port

Relocate and downgrade the St Peters Interchange, moving it closer to the Airport and Port and connect it to the main Stage 3 tunnel – to better connect the Airport and Port, reduce inner-urban traffic impacts and allow the St Peters Interchange site to be put to a more productive use.

Council is concerned the current design does not achieve a key original justification for WestConnex - the need to connect Port Botany and Sydney Airport to western Sydney. Instead it delivers traffic to St Peters some distance from these destinations, necessitating the use of surface roads for completion of the journey. Council notes the proposed Sydney Gateway is intended to provide this connection, but it is a separate project that would be delivered after WestConnex.

In order that WestConnex provide this connection, Council proposes the St Peters Interchange be relocated to a suitable site closer to the Airport and Port, and the interchange be located beneath the surface with a reduced number of entry/exit options. This would not only improve access to the Airport and Port at lower cost within a shorter timeframe than the current design, it would avoid significant additional traffic being directed through St Peters and Alexandria. This is consistent with the above argument that motorways should not direct traffic *through* inner-Sydney. A further benefit is that the large, well-located St Peters Interchange site could be put to a more productive use.

Element 3: Remove from the Rozelle Interchange connections to Anzac Bridge and The Crescent

Connect the main Stage 3 tunnel to Victoria Road and Western Harbour Tunnel (if built) - but not to City West Link / Anzac Bridge or to Johnstone Street / The Crescent, converting the Rozelle Interchange to a junction below the surface. Whilst this will reduce local vehicular access to WestConnex, it will substantially reduce local traffic and amenity impacts.

The Rozelle Interchange should be downgraded by removing entry/exits onto City West Link Road, The Crescent / Johnstone Street and onto the Anzac Bridge. This would essentially convert the interchange into an underground junction. Council is concerned that if these entry/exit points are not removed, additional traffic would affect densely-developed residential areas along The Crescent and Johnston Street and add traffic to the already congested Anzac Bridge and City West Link Road. Removal of these entry/exit points would reduce local vehicular access to WestConnex, but this loss of convenience would be far

outweighed by the benefits of preventing WestConnex traffic spilling onto residential streets and the Anzac Bridge.

Although there is no traffic data within the Concept Design, Council is aware that a significant proportion of the Anzac Bridge traffic stream is travelling to or through the Sydney CBD - the remainder is travelling north over the Harbour Bridge. Preventing traffic accessing the Anzac Bridge is not only important to prevent further congestion on the bridge, but to prevent further traffic accessing the Sydney CBD. As explained above, Council is keen to ensure that traffic does not penetrate densely developed inner-urban areas, and this includes the CBD.

The Rozelle Interchange as designed is complex, with most access ramps underground, so would be difficult and costly to construct. Several of the interchange's ramps would need to be constructed with steep gradients to transfer traffic from significant depths to the surface. Council is concerned these steep gradients increase per-vehicle emissions, adding to air pollution impacts and necessitating larger ventilation facilities than would otherwise be needed.

Element 4: Proceed with the Iron Cove Link

Connect the main Stage 3 tunnel to Victoria Road via the Iron Cove Link tunnel, with amenity, active transport and public transport improvements implemented on the surface along that section of Victoria Road.

As outlined above, Council proposes that the only entry/exit point to the Rozelle Interchange would be via Victoria Road as proposed, i.e. via the Iron Cove Link traffic portal on Victoria Road near Terry Street. This single access point would allow the Iron Cove Link tunnel to proceed as planned, reducing traffic on the surface and providing an important opportunity to create improvements to Victoria Road between the Iron Cove Bridge and Springside Street at Rozelle. Improvements would include landscaping and other amenity improvements, active transport links and improved public transport.

The Concept Design has indicated that these kinds of improvements would proceed if or when the Iron Cove Link component of Stage 3 is implemented. The challenge for Council will be to ensure that reduced traffic correspondingly results in reduced capacity for vehicles and increased capacity for active/public transport and amenity improvements. From Council's prior experience, there has been resistance from RMS to reduce traffic capacity on main roads even where traffic levels have been reduced. Council seeks to avoid a situation where increased road capacity below-ground has not resulted in a corresponding reduction above-ground.

Element 5: Minimise traffic impacts on all adjacent surface roads

Minimise traffic impacts on local roads through processes such as Council's Local Area Traffic Improvement Strategy, funded by the NSW Government.

Above it was explained that local operational traffic impacts should be minimised by reducing the number of entry/exit points to interchanges. Beyond this, traffic impacts should be further reduced by traffic-calming all local roads that may be affected by increased traffic from WestConnex. Council was disappointed that the WestConnex Stage 1 and 2 conditions of approval did not require such treatment of local streets pre-operation, so has embarked on the development of a Local Area Traffic Improvement Strategy.

The strategy aims to identify (via traffic modelling, now underway) local streets that may be affected by WestConnex traffic. Once these have been identified, suitable Local Area Traffic

Management (LATM) schemes will be designed to manage the impacts. Although Council is funding the development of this strategy, it will be seeking funding from the NSW Government for implementation of LATM scheme works – an appropriate action given the need for these works has been created by WestConnex.

Although Stage 1 and 2 conditions of approval require an assessment of operational traffic impacts 12 months and five years after opening of these projects, Council believes that such an assessment should also be undertaken after two years. Three traffic assessment stages are needed to ensure works to address traffic impacts are implemented in a timely manner. Timely implementation of these works is important to ensure there is acceptance of altered road conditions and corresponding positive behaviour change by drivers.

Element 6: Improve all surface roads where traffic has been reduced by WestConnex

Capitalise on opportunities for amenity and public transport improvements on all roads where traffic has been reduced, e.g. guided electric transit on Parramatta Road and improved bus services on Victoria Road.

Improvements to Victoria Road facilitated by the Iron Cove Link have been discussed above. At a wider scale, *all* opportunities for these kinds of improvements should be pursued wherever traffic has been reduced by WestConnex. In addition to Victoria Road, Parramatta Road represents a significant opportunity for surface improvements to a major roadway made possible in-part by WestConnex. Council has been advocating for some time that traffic capacity should be reduced to allow for the implementation of centre-lane running guided electric transit.

Despite Council's advocacy efforts, the NSW Government has not yet committed to the kind of high quality transit that is necessary to rejuvenate Parramatta Road, despite such rejuvenation being an aim of the NSW Government's Parramatta Road Transformation Strategy and WestConnex. Improvements to kerb-running bus services have been proposed, but Council believes the quality of such a service is not sufficient to serve the additional development proposed by the Parramatta Road Transformation Strategy and create the kind of improved amenity desired.

Element 7: Extend dedicated bus lanes across Anzac Bridge

Extend dedicated bus lanes across the Anzac Bridge – made possible by ensuring WestConnex does not add extra traffic to the Anzac Bridge.

As described above, deletion of the entry/exit point connecting the Anzac Bridge to the Rozelle Interchange would avoid traffic increasing on the Anzac Bridge. This would facilitate the extension of existing dedicated bus lanes from their end point at Victoria Road across the Anzac Bridge. This would reduce bus travel times, improving public transport access to the Sydney CBD for the local community, and for the wider community accessing buses 'upstream' at suburbs such as Gladesville and Drummoyne. Traffic reduction benefits would also flow from commuters switching from private vehicle to public transport as the service improves.

Element 8: Proceed with the Rozelle Rail Yards recreation area

Convert the Rozelle Rail Yards (RRY) site to parkland designed in conjunction with Council and the community to assist with offsetting currently low levels of open space in the Rozelle area.

Conversion of the RRY site to a recreation area, along with the abovementioned surface improvements to Victoria Road are two components of WestConnex Stage 3 that would benefit the local community. Although these benefits are welcomed, they are overshadowed by the project's negative features, so it follows that Council would prefer these two projects to proceed without WestConnex.

The proposed recreation area would offset currently low levels of open space in the Lilyfield/Rozelle area and would provide for future extensive residential and commercial development planned for the Bays Precinct. It is anticipated that Council staff and local residents will be closely involved in progressing designs for the RRY recreation area – necessary to achieve the best possible outcomes for the community. Below is an outline of Council's expectations for planning, delivery and ownership of the site.

Element 9: Implement other traffic demand-management measures

Implement a range of other traffic demand management measures to reduce traffic growth and the need for extra road capacity.

In addition to the other elements discussed above, a range of demand management measures could be applied across Sydney to reduce the need for expansion of road capacity. Suggestions for these kinds of measures are outlined in the City of Sydney's alternative strategy. They include: removal of the access fee at the two Sydney Airport railway stations; bringing forward construction of the Sydney Metro West from Parramatta to the Sydney CBD; application of tolls to the existing M5 to reduce demand; peak-period restrictions for freight deliveries in the CBD; and reduce east-west travel in the longer-term by promoting jobs growth in Western Sydney and bringing forward construction of Western Sydney Airport.

COUNCIL'S THIRD-TIER POSITION – LOCAL ISSUES

The third-tier of Council's position on WestConnex Stage 3 are the more detailed, local issues that would need to be addressed in the EIS and resolved or appropriately conditioned and managed if the project was to proceed according to the Concept Design. This is not Council's preferred position, but has been included in this to ensure the Inner West community is protected against impacts from the project and that opportunities for positive outcomes are taken wherever they arise.

Council's identification and discussion of these local issues below draws on Beca's assessment at **Attachment 2**. Beca's assessment, through a facilitated process, was commissioned by Inner West Council to ensure *all* issues raised by the Concept Design and associated background documents have been identified and assessed.

The main documents and other information sources used for the assessment by Beca include:

- SMC (2017) *WestConnex M4–M5 Link Concept Design Plan*;
- DP&E (2016) *WestConnex M4-M5 Link State Significant Infrastructure Application Report (SSIAR)*;
- DP&E (2016) *Secretary's Environmental Assessment Requirements (SEARs) for Preparation of an Environmental Impact Statement (EIS) for the M4-M5 Link*;
- City of Sydney (2016) *The WestConnex Challenge, Public Summary Report and WestConnex - Alternative Proposal*; and

- miscellaneous written representations on various parts of WestConnex from Council and the community over 2016 and 2017.

The discussion of local issues also draws on Council staff's experiences throughout 2016-17 with discussing Stage 3 with SMC and Roads & Maritime Services (RMS) staff. It also draws on staff's experiences with working with Haberfield and St Peters residents and DP&E and Environment Protection Authority (EPA) compliance staff to address local issues that have arisen from construction of WestConnex Stages 1 and 2. Should Stage 3 proceed, Council is keen to ensure that lessons from Stages 1 and 2 are learned so that conditions of approval are strengthened, construction practices improved and incidences of non-compliance reduced. It is imperative that residents affected by Stage 3 are not subject to the same unacceptable - in some instances "intolerable" - impacts that have been experienced by residents affected by Stages 1 and 2.

Issue 1: Air quality & visual impacts from ventilation facilities

Air quality and visual amenity concerns from unfiltered ventilation facilities proposed for the RRY site and Victoria Road near Terry Street – the latter facility raises particular concerns due to its proximity to densely developed residential areas.

There has been particular concern in the community about air quality and visual amenity impacts from the ventilation facilities proposed for Stage 3 within the RRY site (near The Crescent) and on Victoria Road near Terry Street. The latter facility has raised particular concerns due to its proximity to densely developed residential areas. This is exacerbated by the fact that residential areas on the eastern side of Victoria Road are elevated, so there is a possibility that some dwellings will be above the level of the facility outlet.

Rozelle Primary School is also within close proximity to this latter facility, and Council is aware that the school's Parents' and Citizens' Association (P&C) has raised concerns about air quality impacts on children. Although raising the height of ventilation facilities increases dispersal of emissions, it also increases visual impact. Concerns have also been raised about emissions from the Stage 1 and 3 ventilation facility on Parramatta Road at Haberfield affecting Haberfield Primary School and emissions from the Stage 2 and 3 facilities at the St Peters Interchange affecting St Peters Primary School.

Council is of the view that releasing emissions from these facilities unfiltered - as is proposed for all stages of WestConnex - is not acceptable, even if compliance is achieved with regional air quality standards. Council is aware that filtration is costly, reduces the dispersal of emissions by slowing the velocity of air passing through the facility and is not currently applied (or proposed to be applied) to any motorway tunnel in Sydney. Nonetheless, Council will continue to argue that filtration be applied to all WestConnex ventilation facilities to ensure every effort is made to minimise air quality impacts. As far as Council is concerned, the added financial cost of filtration is justified to ensure the health costs of WestConnex are not passed on to the community.

Council will also continue to argue that the community is kept fully informed of the results of air quality monitoring established for all stages of WestConnex, including Stage 3. This should include the real-time online display of air quality monitoring data, as has been established for monitoring of emissions from passenger cruise ships berthed at the White Bay terminal. Council has recently written to EPA to request this arrangement for WestConnex.

At a strategic level, Council's preference for public transport is partly based on the air quality benefits that accrue from public transport over motorways. Council accepts that due to technological advances per-vehicle emissions have declined in recent years, but remains

concerned about additional traffic generated by WestConnex negating technology-related air quality reductions. Council continues to argue that high-occupancy public transport coupled with transit-oriented development is the best way to achieve per-capita emission reductions. It is acknowledged that currently a proportion of the electricity generated for public transport is from coal-fired power stations, but the goal for the longer-term should be that public transport is powered by renewables.

Issue 2: Overall construction impacts

Concerns about the full range of construction impacts – including, traffic, parking, noise and dust – around all Stage 3 construction sites;

Council's experience with WestConnex Stages 1 and 2 has proved that the project's construction impacts can have profound negative impacts on communities and individuals. Even where construction activities comply with the project's conditions of approval, many residents of Haberfield and some residents of St Peters have complained over a long period about unacceptable and at times "intolerable" impacts.

The most pressing of these is noise from night-works, as residents continue to suffer health problems from sleep deprivation. The impacts are particularly acute when night-works are undertaken over a long period without adequate respite periods. They are also acute when there are cumulative impacts from overlapping noise envelopes from several construction areas, and where contestable project works are undertaken at the same time as non-contestable project-related utility relocations and geotechnical investigations. Added to this is noise from trucks idling in residential streets, noise/vibration from tunnelling. For Stage 3, these issues need to be addressed in the EIS, resulting in conditions of approval that are stronger and more comprehensive than those applied to Stages 1 and 2.

A further pressing construction issue is project-related parking demands. Since construction of Stages 1 and 2 began, Haberfield and St Peters residents have complained about kerbside parking pressures created by WestConnex construction. Whilst SMC has made some effort to address parking issues through actions such as creation of dedicated car parks, Haberfield residents have recently expressed their dismay that some of these car parks are largely unused, being located away from construction sites. It is apparent to Council that conditions of approval for Stages 1 and 2 related to parking are vague and unenforceable. If Stage 3 proceeds, strong conditions of approval with penalty provisions are needed to enforce good-practice parking management. This is particularly important for Stage 3 areas, as the density of development and parking demand is similar to or greater than Stage 1 and 2 areas.

In response to the range of construction issues being raised by the community and at WCLF meetings, Council has recently written to the DP&E to request the following WestConnex construction issues from Stages 1 and 2 be handled differently for Stage 3:

- lack of NSW Government compliance resources for this very large, high-impact project, with some conditions (such as those related to employee car parking) not sufficiently strong or clear to enable adequate enforcement, as well as inadequate penalties for non-compliance;
- cumulative impacts from contestable (project) works being undertaken at the same time as non-contestable (utilities) works - Council has also raised this issue with the EPA;
- the priority SMC appears to give to meeting project completion dates at the expense of managing construction impacts on the community – for example, by scheduling excessive night-works, which are a particular concern due to the health impacts of sleep deprivation;

- employees' cars and other project vehicles continuing to be parked in residential streets, even when off-street parking facilities have been provided;
- instances where there has not been adequate lead time to inform Council, community and other stakeholders about forthcoming works;
- instances where there has not been co-ordination between staff from State agencies, SMC and the Joint Venture (JV) in disseminating information to the community and in managing altered traffic/transport arrangements;
- project trucks departing from routes defined by conditions of approval and travelling along local residential streets – with resultant noise and traffic safety impacts; and
- inadequate arrangements for the marshalling and queuing of project trucks, resulting in ad-hoc marshalling and consequently noise and traffic safety impacts.

In addition to the kinds of cumulative impacts outlined above, Stage 3 cumulative impacts could be expected from the combination of WestConnex with construction of development within the Bays Precinct, Balmain Power Station site, industrial developments/activity along James Craig Drive and possibly the Western Harbour Tunnel.

As is explained below, the proposed widening of Victoria Road between the Iron Cove Bridge and Springside Street raises concerns about property acquisitions. It also raises concerns about noise, dust, traffic and parking impacts from the proposed Victoria Road construction site on the densely developed residential area surrounding the site. Numerous dwellings would be located directly adjacent to the site, and whilst dwellings at ground level could be protected by noise barriers, there are numerous multi-storey dwellings on the eastern side of the site that could not be protected in this way. All potential impacts from this site need to be carefully assessed in the EIS.

Issue 3: Particular concerns about construction impacts from dive-sites

Particular concerns about noise, dust and traffic impacts from the mid-tunnel construction dive-sites proposed for Darley Road, Leichhardt and Bridge Road / Parramatta Road, Annandale.

Throughout 2016-17 Council, community groups and individuals have been raising issues and expressing opposition to Stage 3 mid-tunnel construction dive-sites proposed for Darley Road, Leichhardt and Bridge Road / Parramatta Road at Camperdown/Annandale. Both of these sites are within densely developed areas that include sensitive land uses. As is discussed above, WestConnex construction activities at Stage 1 construction dive-site at Haberfield have had a major impact on Haberfield residents. The Darley Road and Bridge Road dive-sites would have an even greater impact, as surrounding development is within closer proximity and at a higher density. Around both sites are residential areas, while a primary school is located on the opposite side of Parramatta Road to the Bridge Road site. Major concerns are raised about the noise, dust and truck traffic impacts on surrounding residents and school students.

Traffic safety issues are a particular concern for both sites. Truck access to the Darley Road site involves negotiation of a steep, curving and heavily-trafficked intersection with City West Link Road. At this intersection is a well-used signalised pedestrian crossing that provides access to the Leichhardt North Light Rail Stop. Although truck access to the Bridge Road site would be to/from main roads (Parramatta Road and Bridge Road), these are also heavily-trafficked and there is potential for conflict between spoil trucks and the numerous buses that run along the kerbside lane on Parramatta Road. The acute angle of the Bridge Road / Parramatta Road intersection would not allow for circling of spoil trucks around the Bridge Road site. For both sites, there is the potential for truck conflicts with cars and

bicycles on any road, and conflicts with pedestrians at pedestrian crossing and wherever trucks cross footpaths. For this reason, working hours will need to avoid peak traffic periods, particularly where school travel safety issues are raised.

Issue 4: Opposition to dive-sites & preference for potentially lower-impact alternatives

Opposition to the Darley Road and Bridge Road dive sites, with a preference for no dive-sites, or a potentially lower-impact dive site option at the western end of the Rozelle Rail Yards (RRY) site.

As a result of Council's concerns about the Darley Road and Bridge Road sites, Council has continually expressed its opposition to these sites, with a preference that there be no mid-tunnel dive-sites for Stage 3. In expressing this view, Council recognises that if there were no mid-tunnel sites, all spoil would need to be removed from portals at Haberfield and in the RRY site over a longer construction period, which would extend construction impacts at the Haberfield and RRY site portals. Council has consequently argued that a site at the western end of the RRY site could potentially offer a lower-impact alternative to the Darley Road, Bridge Road and no dive-site options.

In early 2017, Council undertook its own assessment of dive-site options, assisted by a consulting engineer – at **Attachment 3**. The engineer's assessment confirmed that the RRY site was potentially a lower-impact option compared to Darley Road, and could technically be implemented. However the report raised a number of queries about future use of the site - such as its future use for light rail stabling - which Council had referred to SMC to answer. To date Council has not received a satisfactory response even though the Concept Design states that SMC will continue to investigate the RRY option. Council requests that SMC responds to its queries prior to release of the EIS, and that the RRY option be fully assessed in the EIS.

Issue 5: Continuation of construction impacts at Haberfield

Concerns about continued use of existing Stage 1 works compounds at Haberfield for Stage 3, resulting in an extension of construction impacts – a particularly important issue as Haberfield residents have already endured significant impacts from the construction of Stage 1.

Haberfield residents continue to express their concerns to Council about the “intolerable” impacts they have endured without respite throughout 2016 -17. Most residents had anticipated that this would draw to a close as Stage 1 moves to completion. They are now distressed to learn from the Concept Design that the Stage 1 worksites at Walker Avenue and Wattle Street will be used for construction of Stage 3 – extending impacts for a further three years. As is discussed elsewhere in this submission, Haberfield residents have been particularly affected by out-of-hours works, which have resulted in health problems from sleep deprivation.

Council is concerned that the response by SMC on health issues created by Stage 1 construction has not been adequate, nor has the response from NSW Government agencies responsible for compliance and the health and well-being of Sydney's residents – DP&E, EPA and NSW Health. Council is also concerned about under-reporting of these health issues, as residents speak of “complaint fatigue” – where they feel their repeated complaints have not resulted in positive responses. They eventually stop complaining and endure the impacts in silence. For some residents language has been barrier to making complaints, and under-reporting has arising from a proportion of complaints not being officially registered, e.g. verbal complaints to project construction staff.

Council is firmly of the view that Haberfield residents have already been subject to considerable impacts from Stage 1, and extending the construction for a further three years raises serious health concerns. It is thus imperative that if Stage 3 proceeds, DP&E, EPA and NSW Health must investigate all construction-related health issues and work collaboratively to ensure they are addressed in the EIS and that strong, comprehensive conditions of approval are drafted to minimise construction impacts across the project.

An issue Council has raised previously in relation to Stage 1 that is relevant to Stage 3 is the current and future impact of WestConnex on residents of five dwellings at 14 to 24 Wattle Street, Haberfield. After suffering years of construction impacts, these residents will suffer operational traffic impacts to a higher degree than most residents in the area. Council seeks mitigation of these impacts to the satisfaction of all owners/residents of these dwellings.

Issue 6: Provision of truck marshalling areas & management of impacts

Concerns about noise, safety and amenity impacts from truck marshalling on streets, and consequently a requirement that off-street marshalling areas be provided.

Throughout 2016 and 2017 the community has been raising issues about inadequate arrangements for truck marshalling. Although it has not been such an issue for Stage 2 as the St Peters Interchange site has been able to accommodate this function, it has been a major issue for Stage 1. Residents of Haberfield and suburbs further afield have complained about what has appeared to be ad-hoc marshalling of trucks in residential streets, with sleep disturbances suffered from truck engines idling in the early morning period. Lack of marshalling arrangements has led to circling of trucks around Haberfield streets and queuing of trucks on Parramatta Road at Haberfield as drivers await clearance to enter construction sites. This has raised noise and traffic safety issues. Council is aware that DP&E compliance staff have taken formal action on the Parramatta Road queuing issue.

Given these Stage 1 issues, residents in the Stage 3 area are anxious about similar poorly-managed truck marshaling in their suburbs. Council has recently written to the DP&E to raise these issues, suggesting that the DP&E develops strong, comprehensive conditions should Stage 3 be approved, to ensure suitable marshalling areas are provided and are well-managed.

Council is also concerned about trucks using residential streets to travel between marshalling areas and construction sites. If the RRY site is used for marshalling as is expected, trucks are likely to use Johnston Street to access the Bridge Road mid-tunnel construction dive-site. The high-frequency of truck movements, coupled with sensitive uses along Johnston Street (schools, residential areas and local shops) would result in unacceptable conflicts.

Issue 7: Construction & operational traffic impacts around the Rozelle Interchange

Concerns about increased construction and operational traffic in the area around the proposed Rozelle Interchange, with consequences for residential amenity, pedestrian and cyclist safety and parking demand.

Above Council has raised its concerns about the full range of construction impacts from the community's experience with WestConnex Stages 1 and 2. Even where construction activities comply with the project's conditions of approval, residents complain that construction impacts being "intolerable". Construction traffic is a major contributor. Should Stage 3 proceed, it is imperative this situation not be repeated in and around Stage 3

construction areas, particularly as the density of residential development around these areas is generally higher than around Stages 1 and 2.

Above it was explained that Council is particularly concerned about construction impacts from dive-sites proposed for Darley Road and Bridge Road due to frequent spoil truck movements over a long period, and the particular constraints and sensitivities of those sites. Pedestrian and cyclist safety would be compromised around those sites at signalised pedestrian crossings, along bicycle routes and wherever construction traffic crosses footpaths.

Operational traffic is a further concern. At the regional scale, Council is concerned about WestConnex promoting traffic growth across Sydney. At the local scale, Council is concerned about WestConnex-related traffic growth across the Inner West Council area - particularly on streets around the Haberfield, Rozelle and St Peters interchanges. For Stage 3, that concern focuses on the Rozelle Interchange. Council's alternative proposal seeks to delete the entry/exit points from the Rozelle Interchange to Anzac Bridge, City West Link Road and The Crescent / Johnston Street, and to relocate the St Peters Interchange to avoid local traffic impacts around these two interchanges.

Issue 8: Operational traffic impacts on Anzac Bridge & The Crescent

Particular concerns about the Rozelle Interchange feeding additional traffic onto the already congested Anzac Bridge and onto Johnstone Street and The Crescent at Annandale – these latter two streets being within densely developed residential areas.

Council is concerned that should Stage 3 proceed with entry/exit points from the Rozelle Interchange considerable additional traffic would spill onto the already congested Anzac Bridge and onto residential streets The Crescent and Johnston Street. Additional traffic would also flow to other connecting streets further afield. This may prompt RMS to consider reconfiguring The Crescent and Johnston Street to accommodate the additional traffic - similar to what is now underway for Stage 2 at Campbell Street/Road, St Peters and Euston Road, Alexandra. Reconfiguring these roads in this way would be at the expense of residential amenity and active transport.

Above it was explained that Council is currently developing a Local Area Traffic Improvement Strategy to identify and traffic-calm local roads that may be affected by additional traffic from WestConnex. The Crescent, Johnston Street and adjoining roads will be investigated as part of this strategy. Above it was also explained that although removal of these two points would reduce local vehicular access to WestConnex, this loss of convenience would be far outweighed by the benefits of preventing WestConnex traffic spilling onto residential streets and the Anzac Bridge. Locals would also derive access benefits from lower traffic levels on the Anzac Bridge and local roads.

Issue 9: Impact of compulsory acquisitions

Impacts from property acquisitions on residents and businesses along a section of Victoria Road at Rozelle from the Iron Cove Bridge to Springside Street – required for construction of the Iron Cove Link tunnel portal onto Victoria Road.

In the early stages of Stages 1 and 2, compulsory acquisition of homes and properties at Haberfield and St Peters devastated the lives of many families, business operators and individuals. To make matters worse, some property owners have claimed the compensation they have received is not sufficient to enable them to purchase equivalent properties within their neighbourhoods. Remaining residents have grieved the loss of families, individuals and businesses that have been forced out of their communities by the project. Council is

concerned that owners of properties along the western side of Victoria Road near the Iron Cove Bridge will suffer a similar fate.

Accordingly, Council requests the continued review of compulsory acquisition processes by the NSW Government, with a view to greater fairness for affected property owners. Council also requests similar improvements to *voluntary* acquisition procedures and application of noise mitigation measures such as double-glazing and air conditioning.

Issue 10: Need for a stronger commitment to surface road improvements

Lack of commitment to traffic capacity reductions and public transport improvements wherever traffic is reduced by WestConnex – in particular, along Victoria Road and Parramatta Road.

Above it was explained that one of the few benefits from WestConnex is the opportunity to reduce traffic capacity and make a range of surface improvements - particularly public transport improvements - wherever WestConnex reduces surface traffic. For Stage 3, the main opportunity is to improve Victoria Road between the Iron Cove Bridge and Springside Street – possible because of surface traffic reductions brought about by the Iron Cove Link. There is also an opportunity to make improvements to Parramatta Road, created by all stages of WestConnex.

As explained above, the challenge for Council and the NSW Government will be to ensure that in every instance reduced traffic results in reduced capacity for private vehicles and increased capacity for public transport, active transport and amenity improvements. Council's prior experience is that RMS will usually resist traffic capacity reductions on main roads, even where traffic levels have been reduced. Council seeks to avoid a situation increased road capacity below-ground has not resulted in a reduction in capacity above-ground. In particular, Council seeks assurance from SMC and the NSW Government that reduced traffic capacity along Victoria Road and Parramatta Road will result increased capacity for public transport.

Issue 11: Impact of clean-up of Rozelle Rail Yards site on heritage and biodiversity

For the RRY site, lack of consideration of retention of rail heritage features in-situ and staging of site clearing to minimise biodiversity impacts.

In its December 2017 submission on Review of Environmental Factors (REF) for the surface clean-up of the RRY site, Council did not object to the clean-up, but stated its preference for this to occur without WestConnex. Council also raised a number of site-specific issues, including retention of rail heritage and minimisation of biodiversity impacts. Council staff discussed these issues at a meeting with relevant project staff during the REF exhibition and at June 2017 site visit. Although Council is satisfied that SMC is aware of these two issues, they have not been resolved to Council's satisfaction.

Regarding rail heritage, Council has been informed that significant items will be re-used, i.e. integrated into the landscaping of the RRY recreation area. Council agrees there is a role for re-use but has argued that some of the more significant items be retained in-situ so the site's rail heritage more accurately interpreted by future users of the recreation area. Regarding biodiversity, Council is concerned that there has not been sufficient consideration given to how works can be staged to minimise impacts on fauna, particularly native reptiles and birds. In order to retain fauna on-site, it is critical that a minimum area of habitat be retained at each stage of the clean-up. Council seeks reassurance that this can and will be achieved.

Issue 12: Need to further improve walk/cycle connectivity across Rozelle Rail Yards site

A greater number and improved quality of north-south walk/cycle connections needed across City West Link and the RRY site to link the Rozelle, Lilyfield and Annandale communities, and to ensure the RRY recreation area is readily accessible to the community.

Council is keen to ensure the creation of the RRY site recreation area results in significantly improved walk/cycle connectivity across this site. Council notes that north-south connectivity has been poor in the past due to lack of any public access to or through the RRY site, although some of these movements have been possible along a limited number of public roads that cross the site, such as Balmain Road and Catherine Street. The wide and heavily-trafficked City West Link Road has also created a barrier to north-south connectivity. On either side of the RRY site, east-west movements have been possible along reasonably direct local streets such as Lilyfield Road, Railway Parade and Brennan Street, even though the City West Link Road is not available to pedestrians and cyclists. Creation of the Rozelle Interchange recreation area represents an important opportunity to improve this situation.

Although Council generally supports the walk/cycle routes proposed within the draft RRY masterplan (within the Concept Design), it is apparent further work is needed to ensure routes follow walk/cycle desire lines and are designed to a high standard. Should Stage 3 proceed, it is anticipated that Council staff will continue to work with project staff to refine these designs. Council's main concerns at this stage are firstly the need for a greater number of north-south walk/cycle connections and secondly, that walk/cycle bridges be constructed to a higher standard than shown.

The two connections shown are welcomed, but a third (and possibly fourth) connection is warranted to ensure maximum connectivity. In the draft masterplan only one of the two bridges shown is a 'land bridge' – the other is a minimum-width bridge without landscaping. All bridges should be designed and constructed as land bridges to ensure the crossing of City West Link Road is as attractive and safe as possible. The added cost is warranted as the RRY recreation area is expected to generate considerable walk/cycle traffic. Prioritising walk/cycle access is also important to minimise the need to access the site by car, reducing the need to provide for parking in or near the site.

It is important that walk/cycle connections to and through the RRY site are integrated into the regional walk/cycle network defined by various active transport plans of the NSW Government and relevant councils. It follows that Council supports the development of the Stage 3 Active Transport Plan described in the Concept Design, and anticipates that Council staff will have the opportunity to refine this plan should Stage 3 proceed.

Issue 13: Need for full delivery of Rozelle Rail Yards recreation area to Council

Above it was explained that Council supports the creation of the RRY recreation area, but would prefer this was delivered without WestConnex. The RRY site should include a mix of active and passive recreation areas, should be designed to minimise maintenance, should integrate security-by-design principles and should be designed so that all internal paths maximise walk/cycle connectivity to surrounding networks. These measures are intended to encourage as many park users as possible to access the site by means other than car.

Importantly, Council expects the RRY recreation area to be delivered to Council for its ownership at no cost, and all landscaping, paths and facilities to be constructed by the NSW

Government according to final masterplan designs. It is also expected that Council will be closely involved in the development of a Plan of Management for this important site.

Issue 14: Need to consider impact on future public transport corridors

Concerns that construction of WestConnex Stage 3 and the Western Harbour Tunnel (if built) may hamper implementation of Western Metro (rail) and sever future light rail links, such as the White Bay / Balmain link.

In its first-tier position, Council expresses a preference for public transport over motorway solutions to Sydney's traffic problems. It follows that Council seeks reassurance that tunnelling alignments and other features of WestConnex Stage 3 and possibly the Western Harbour Tunnel would not create barriers to implementation of future public transport in the area, such as the Western Metro (rail) and link from the Inner West Light Rail to White Bay and Balmain. Earlier in 2017, Council wrote to Transport for NSW and UrbanGrowth NSW seeking such a reassurance, but has not been completely satisfied that relevant NSW Government agencies are co-ordinating on this matter, or have given it the priority it deserves. Council will continue to raise this issue at every opportunity.

Issue 15: Other local issues

A range of other less-critical (but nonetheless important) local issues, some raised by community groups and members of the community.

Beyond the local issues discussed above, a number of less-critical but nonetheless important local issues have been raised by Council staff and the community in relation to WestConnex Stage 3. Most of these issues are discussed in Beca's assessment at **Attachment 2**. These issues include:

- Concerns from residents and local sporting groups about impacts of road closures at Byrnes and Clubb Streets proposed in the Iron Cove Link concept plan (within the Concept Design). Concerns are raised about traffic impacts on residential amenity and reduced vehicular access to King George Park.
- Concerns from residents of Lilyfield and Rozelle about dust (and the possibility this could include asbestos particles) from the clean-up of the RRY being carried by the wind into surrounding residential areas.
- A number of issues raised by Council staff about site contamination and flooding and water quality impacts – particularly as they relate to the RRY site and its surrounds. Council staff discussed these issues directly with SMC staff and their specialist consultants when the RRY Review of Environmental Factors (REF) was on public exhibition at the end of 2017. Written comments from Council staff on these issues were also included in Council's submission on the REF. Recent comments are in the attached Beca assessment.
- Concerns from Council and the community about information guiding SMC's assessment of Stage 3 mid-tunnel construction dive-sites – particularly the Darley Road, Derbyshire Road, and RRY (western end) options - not being freely available to the community.