

- Works under the east-west runway would involve delays to air movements and should be considered in the proposal.
- The Eastern Distributor Taskforce preferred option is full tunnel from the Domain Tunnel to Link Road. This option is not in the proposal and was precluded due to defective consultation process.
- The social impacts from the proposal of community segregation can not be easily estimated in financial, time or other costs. The irreversibility of changed demographic movements, social dislocation, community separation may outweigh the benefits of the proposal itself. Therefore, the Eastern Distributor should be a tunnel.
- Supports South Sydney Council's tunnel proposal and request RTA abandon current proposal.
- Objectives are in 1.6 and not 1.7 as listed in Appendix C.
- Objectives were presented at the Planning Focus meeting on 30/8/96 in which no community consultation was present and therefore no community input.
- The following objectives should be included: ensure economic development of Sydney is supported by ecologically sustainable infrastructure development; and ensure environmental factors are fully accommodated within the proposal.
- There were no community representatives, resident action groups or individual parties present at the Planning Focus Meeting of 30 August 1996.
- Preferred proponent announced on 13/8/96, concept design on 24/9/96 by Rust PPK. By this stage the Planning Focus Meeting (30/8/96) has already been held. Detailed proposal had been submitted by Airport Motorway therefore no community consultation when thought it was happening with the Rust PPKs concept design.
- No community representation is present in either the formulation of the proposal itself, or in framing the Director's Guidelines pursuant to Clause 85. The proposal lacks probative input from the community.
- Concerned about the advertisement of pre-Environmental Impact Statement community consultation, dated 24/9/96 for the following reasons:
 - ⇒ It does not state it is a proposal compared to RTA advertisement 27/1/94 titled "Eastern Distributor Toll Road Community Consultation". This is misleading and fails to bring to the attention the importance of this community consultation process.
 - ⇒ The advertisement does not make reference to the purpose of the consultation compared to the 27/1/94 advertisement. The 27/1/94 leaves the reader in no doubt that the RTA is considering a tollroad and listed the subject areas of issues.

⇒ There was no exhibition period stated in the advertisement and no closing date. Written submissions which arrived too late to be considered in the Environmental Impact Statement would be considered as a formal submission by the RTA following the exhibition of the Environmental Impact Statement. This input will be limited as subject matter may not accord with the Environmental Impact Statement proposal. The advertising did not provide sufficient direction of participation or clarity of subject matter.

⇒ The integrity of the community consultation process in the current proposal is compromised by failing to alert the public to the purpose of the exhibition.

- A mail drop of a community newsletter to 37,000 letter boxes in the study area did not occur as stated.
- Community focus meetings were piecemeal and selective, involving few people. The timeframe was not defined and too short. Material from meeting to meeting varied, for example, maps were hard to read and see. This infers that the proposal was being altered during the community consultation period. Many meetings were instigated by community groups and not Rust PPK.
- The community had no opportunity to participate in the formulation of specific Director requirements or the options.
- The brief for the preparation of the Environmental Impact Statement (August 95) clearly suggest that community consultation would be required. This should have occurred when the proposal was first discussed. Reliance was placed on the brochure drop after receipt of preliminary proposals on 21/9/96. At the time of the brochure drop the 'proposal' was not known. As the brief notes "A further 40,000 brochures were distributed by the RTA advising the outcome of the community consultation and that proposals were to be invited from the private sector for a tolled Eastern Distributor". Hence it can be said that any community input at this time could not have had the proposal in contemplation when making their remarks as they would not have known what the proposal was. These consultations were irrelevant for the purpose of demonstrating community consultation for this proposal.
- The community consultation period leading to the proposal is defective and flawed. There is legitimate expectation from 2.111 Environment Protection Authority that community input would be considered as part of the proponents statutory obligations before presenting it to the determining authority. Has elements of predetermination. Community consultation prior to 13/8/96 was not relevant as the ultimate proposal was delimited due to State and Federal Government announcements, the ITA float and prospectus, the guidelines for prospective bidders to the Government announcements, the ITA float and prospectus, the guidelines for prospective bidders to the Tender and the brief for the preparation of the Environmental Impact Statement itself.

- Following 13/8/96 there was piecemeal community consultation. Proposal presented varied. There was insufficient instruction in advertisements. Community consultation was ignored or relegated to Environmental Impact Statement submissions.
- Community consultation between the proponent and their consultants in 1994 (PPM) was contaminated by the predetermined nature of the proposal.
- The community consultation process has been compromised by less than probative evidence in determining environmental impacts, with exclusion of environmental concerns. The selection criteria used demands the cheapest option. The community was denied to be heard in the community consultation phase.
- It is recommended that the proposal and Environmental Impact Statement be rejected in terms of flawed process and that a new proposal and Environmental Impact Statement be considered as a matter of urgency given the necessity for an Eastern Distributor which accommodates environmental impact on the immediate community.
- The Taskforce should be consulted prior to and during construction in the same way local councils would be consulted.
- The Taskforce should be consulted in any specific issues noted in 11 including construction before and during Centennial and Moore Park trust activities, Royal Botanic, Domain Trust, and Art Gallery and development of environmental mitigative measures in fulfilling regulatory obligations with the Environment Protection Authority, NPWS, Heritage Council and other relevant bodies.
- The community liaison manager should be appointed immediately and be available to liaise at the environmental management plan stage of the process. This will help assist the process of conciliation and arbitration towards reaching amenity especially the issues of just terms land acquisition. Appointing a person now may mitigate damaging relations issues during construction when impacts will be felt by the community.
- Eastern Distributor Taskforce is concerned that the Director should not have included either ATSIC or the Aboriginal Land Council on the list of agencies/bodies consulted. It is noted in the Environmental Impact Statement that the Aboriginal Land Council were consulted. Eastern Distributor Taskforce would like clarification. Eastern Distributor Taskforce request that diligence be demonstrated in consultation with Aboriginal organisations including land councils, ATSIC and other appropriate people in the area.
- The Eastern Distributor Taskforce request that it be included in the formulation of an Environmental Management Plan and be a member of the Community Liaison Group and be entitled to send delegates.
- The relationship between the proponent and ITA reflects pre-determination in the selection of the proposal. This is considered as: guidelines were prepared without community consultation; selection of preferred proponent was made with no community consultation, the 37,000 brochures were not received by the community; there were no community representatives at the Planning Focus meeting of 30/8/96 and little community consultation

in the Director's requirements. The ITA prospectus suggests proposal was in contemplation in early 1996 without community consultation. The seed float with comments in the prospectus suggests projects of this kind follow through to "financial completion" suggest a certainty of the project which is otherwise unfounded.

- The notion of a toll plaza being considered without sufficient pre-Environmental Impact Statement community consultation is tantamount to pre-determination.
- Preventative criteria of meeting RTA policy criteria is not met.
- The determining authority should stipulate stringent approval conditions on noise. Regulatory instruments can not overcome patent defects in the proposal once constructed. Any ameliorative and design measures to mitigate noise impact can only be dealt with during the forward planning and project control
- Kidmans Terrace on the eastern side of the road between Plunkett Street and Spence Lane has a present noise level of 20 heavy vehicles per hour added to car traffic. Approximately 26% of residents suffer sleep disturbance. The operational impact of the proposal will increase disturbance anywhere between 33% and 43% due to increase in heavy vehicle movements to approximately 50 per hour.
- Relocation of utility service must be fully accommodated (7.3.4 and Appendix H). The Eastern Distributor Taskforce has taken steps to review the ultimate impact of telephone, electricity, gas and sewerage and will report its findings to the determining authority when available.
- Considers noise predictions of noise traffic levels is misleading. The Environmental Impact Statement states that there are no local roads where the noise are predicted to increase significantly, that is above 3db(A). This subjective description of noise is rejected 3db(A) barely perceptible, 5db(A) barely perceptible, 5db(A) noticeable and 10db(A) change halves or double noise.
- If noise readings are averaged over 24 hours and the average after increase in traffic is stated as 3db(A) higher than it was before the increase, then no probative conclusion can be drawn from such assertions, as to noise events causing the increase at any one point over a 24 hour period.
- A specific event such as a single truck can generate a spike noise increase much higher than the 3db(A) increase being suggested.
- There will be disruption for access to and from properties along the proposed construction area. Businesses and residents along the length of the project and neighbouring suburbs will be severely affected from access and disruption to their lifestyles. Therefore support South Sydney that community provided with construction schedules.
- The wording of page iv of Appendix C of the Environmental Impact Statement refers only to 'social impacts both during and after construction of the proposal' whereas the Director's specific requirement speaks of "impacts both during and after the construction.

- It is difficult to see the relevance of Environmental Impact Statement 7.1 to the requirement of Director to establishing the sense of identity of the Domain.
- 9.2 deals with traffic and transport issues and barely deals with the Domain.
- The only areas of significance dealing with the Domain are found in 10.2.1 which does not address the potential re-establishment of the sense of identity. This factor has not been adequately addressed.
- The residents will be left with a scar and there is no answer on how the severance of Woolloomooloo from the Domain will be overcome.
- The proponent dismisses the phenomena of induced traffic by misdescription of the SACTRA 1994 report.
- The RTA has failed to adequately address traffic effects in the proposal.
- The RTA uses the fixed matrix approach which is discredited in SACTRA.
- Provides quotations from SACTRA in the submission which concludes induced traffic does occur and economic value can be overestimated by the omission of induced traffic.
- Several reports including SACTRA indicate travel time is an important behavioural parameter. Where Australians are prepared to allocate one hour per day to travel, travel times in world cities are similar irrespective of road speeds and a public transport patronage declines as road speed increases, travel times are similar to inner and outer areas of Melbourne and time savings from faster transport in Sydney have been swallowed by increased distances travelled and high elasticities with respect to travel cost; hence even higher elasticities with respect to travel time which is the major non pecuniary component of generalised travel. APT presumes that this elasticity also indicates, as per the STP database, that some of the additional road travel would be drawn from alternative modes and the overall transport time cost elasticity would be about unity.
- Travel time is exploited in an expansionary and contradictory manner.
- The proponent denies induced traffic events for Sydney. However, the Sydney Harbour Tunnel, Southern Cross Drive and M4 testify to induced traffic.
- Shopping and distribution centres are planned around isochrones, not areas as market size expands.
- No attempt is made to assess the localised traffic events such as the Supa Centre, Green Park, the ACI site redevelopment, and the Naval site redevelopment. These developments are assessed under part iv of the EP&A Act 1979 as development applications. From information provided by the RTA the determining authority can not ascertain potential increases in traffic growth due to improved traffic conditions as a result of the proposal and economic renewal in the city south region from these developments. To scientifically

estimate traffic impacts from these developments the RTA must consult relevant authorities and await instruction as to these traffic generating events.

- The Eastern Distributor will lead to an increase in freight traffic whose main fuel is diesel. Environmental Impact Statement chapter 10.8 fails to predict or monitor air quality compounds of PM-10 and benzene. These are found in diesel exhaust and are harmful to health.
- Access to recreational facilities such as Moore Park will be affected.
- The option assessment in Chapter 6 substantially goes to construction design issues. The community is provided with options which range from bad to worse. Options sympathetic to the public interest have not been considered.
- The RTA's brief to bidders state that "The private sector advance proposals similar to the RTA's proposed Eastern Distributor as a solution to the traffic needs of the area". The submissions indicated that the proposal was viable as a tollroad. Therefore the decision to make the proposal a tollroad was undertaken before community consultation.
- Alternatives such as a full tunnel were ignored. Alternatives have not been adequately considered.
- Treatment of a do nothing option is not adequately considered. For example, the Environmental Impact Statement 6.4.9 option SDS1 (do nothing) "would result in continued and worsening traffic delays during peak periods with no changes in the biophysical and social environments related to traffic growth and traffic congestion along the freeway. These statements overstate social costs while understating or not mentioning all diseconomies for example, visual impact, habitat loss, disutility measurements of noise and air. There is no attempt to quantify other costs such as the opportunity cost of this activity and risks such as risk to exposure to contractual breaches under existing NSW Government contracts including the New Southern Railway.
- The assessment does not assess the options by any accepted method of comparative assessment such as cost benefit analysis. The analysis relies on subjective selection of costs and benefits in an attempt to gain desired outcomes. These outcomes appear pre-chosen in order to achieve some other criteria of which Eastern Distributor Taskforce is unaware.
- The preferred proposal becomes self-fulfilling by striking out the possibility of diseconomies and not subjecting the options assessment to scientific analysis. Given the paucity of scientific consideration the preferred proposal assessment (6.5) lacks either probity or merit.
- State and Federal Government announcements around 13/8/96 suggest that economic parameters had been set well before the public consultation phase. In particular \$2 toll for north travelling vehicles, 38 year life cycle, federal tax concessions amendments per Section 169GZZ Income Assessment Act 1949 and alleged Council land rates concessions for tollway landowners. These announcements delimit any future outcome of adjustments

based on the findings of the environmental impact assessment. The economic viability of any proposal based on these limits would thwart negotiations in support of alternative options that may have a higher base cost. An example is the tunnel option. Based on the economic criteria, it is clear that it was not in contemplation that the NPV and ROI criteria could be satisfied under such a regime if the base cost of this project were to rise due to higher construction costs of a full tunnel option. Therefore tunnel was never considered. This demonstrates an attitude which is an affront to the statutory intent of Section 111 EPAA, because the proponent has denied their responsibility to provide the determining authority information which examines and takes into account the fullest possible extent all matters affecting or likely to affect the environment by reason of that activity. The Determining Authority has been given only one proposal, with other environmentally more sensitive options being thwarted by economic delimits which have precluded their consideration. Social costs of this proposal have been ignored to be silently absorbed by residents immediately in the vicinity of the proposal.

- The Environmental Impact Statement Practice Guidelines: Roads and Related Facilities requires the proponent to “avoid unsupported or unsubstantiated opinions biased towards a predetermined option”. The guidelines state questions “any areas are fundamentally inappropriate because of its high environmental significance” and “do initial investigations indicate that the area is fundamentally unsuitable”. Pre-Environmental Impact Statement consultation there was never consideration of options other than a tollway, which always contemplated a corridor through environmentally sensitive areas such as Woolloomooloo. A “do-nothing” option was never presented pre-Environmental Impact Statement and is only referenced as it is a Director’s requirement. The Guidelines have not been adhered to and best practice guidelines not complied with.
- Pedestrians will only be able to cross the 3km length of South Dowling Street at four points. This will prevent access to Moore Park, Centennial Park, Sydney Cricket Ground, Sydney Football Stadium and Showground. No mitigating measures are proposed to overcome this severance of precincts and access to public recreational facilities.
- The only reference for the Sydney 2000 planning is Chapter 4 and there is one reference to using Sydney Football Stadium for soccer. This does not satisfy the Directors requirement in Part A.
- There has been little time to prepare a detailed response to all Environmental Impact Statement issues, let alone critically review much of the empirical data and projections made (eg traffic simulation, air, and noise information). Given the shortness of time relative to the complexity of the proposal, the Eastern Distributor Taskforce reserves the right to forward specific technical, scientific and other data being presently collated.
- The Eastern Distributor Taskforce supports the South Sydney’s Council’s comment that the resolution of the Southern Arterial Route and east-west corridor (such as McEvoy Street route) is necessary both for this function as part of planning for the Green Square Redevelopment area and surrounding commercial districts. The Environmental Impact Statement although it mentions these individual projects does not shed light on these issues. No integration proposed on how these redevelopments will benefit. Under the EPAA the RTA is bound to address wider issues and not just merely mentioning benefits perceived for the developments.

- There has been no effort to investigate whether the subject area has endangered animals likely to be affected by this activity. This is surprising given that heavily degraded areas such as the Olympics Village, Homebush Bay and the old Telecom Site at Cox's Creek, Greenacre contain sustainable populations of the Green and Golden Bell Frog. These sites were regarded as questionable fauna habitat merit until detailed investigations revealed surprising population counts of the frog.
- The RTA's cursory treatment of fauna does not satisfy the non-application of Section 112(1b) Environment Protection Authority. A SIS should be undertaken before approval.
- It is noted that the Golden Bell Frog and abovementioned bird species do not constitute the totality of endangered fauna that is known to exist in the areas directly affected by the proposal.
- Proposed mitigation of noise impacts at Environmental Impact Statement 9.8.5 speak in generalities. For example, 'comprehensive community consultation', 'implementing traffic mitigation measures', 'given the sensitivity of night time activity, all possible measures are to be incorporated to minimise noise impacts'. These statements do not actually state what the proponent recommends in mitigating constructions noise impact. Statements such as these are vague generalities and lack substance.
- The Eastern Distributor Taskforce doubts that the known noise events during construction listed in Paragraph 8 of the Wilinon Murray report will be easily mitigated.
- Every identified section of roads during construction will have noise levels that exceed even the proponent's objective db(A) limits.
- Noise control measures during construction should be fully particularised and submitted by the proponent before approval is given.

959. GERENCER Eva (Bicycle New South Wales Inc)

- Despite the two week extension on Environmental Impact Statement comments it was a short time frame to enable effective community consultation. Given the bulk and complexity of the documentation it is out of the scope of many non-government organisations to have the resources to enable a detailed analysis of the Environmental Impact Statement.
- The assessment of economic viability of the project is based on increased traffic growth. As the road is privately funded, and given the incentive of private profit, it then follows that increased profits result from increased funding from tolls ie increased numbers of motor vehicles.
- The Environmental Impact Statement predicts that the Eastern Distributor will be close to capacity during peak period by 2011. Other options are not explored. NSW Government states that travel alternatives to the motor vehicles should be encouraged.

- The proposal makes walking and cycling more difficult.
- Communities will be severed (Environmental Impact Statement, ps-ix).
- Concerned that the proposal will generate extra traffic when Sydney needs to reduce traffic. The Environmental Impact Statement does not seriously acknowledge the adverse impact that the motorway will have on surrounding areas of Sydney. If there is an increase in vehicles on the Distributor then there will be an increase in vehicle activity accessing the Distributor.
- The Environmental Impact Statement claims that the Distributor will make a positive contribution to decreasing greenhouse gas emissions and increase fuel savings is misleading (P11-4). The fuel savings are unrealistic as the motorway will generate more traffic. Vehicle increase by 0.4% is claimed to be small without stating the base upon which this increase is measured. This is in contrast to what the Director-General of the Environment Protection Authority stated in his letter to the Government Pricing tribunal "It is clear that to meet appropriate air quality goals in the future we will need to achieve a substantial reduction in vehicle kilometre travelled, from that currently projected."
- The Environmental Impact Statement does not quantify the cost of roadworks required in other parts of Sydney which are already at or near capacity which would feed into the motorway due to increased traffic off the Distributor. These costs would be met by the taxpayer, a subsidy to private operators of the motorway.
- Instead of proceeding with the Distributor both public and private funds should be directed toward the provision of public transport initiatives which are linked to an integrated bicycle network. Funding the Distributor entrenches the supremacy of the motorcar over other forms of transport in the city. To provide quality of life and balanced transport then the Distributor should be rejected.
- From the RTA's budget only \$8 million is spent on bicycle facilities per year. This is a slow start in achieving the Government's policy of constructing the bulk of a bicycle network in NSW by the year 2000. For an estimated \$40 million per year over 8 years, less than half the budget of the Distributor, thousands of kilometres of cycleways could be built across the state, linking suburbs and communities with transport interchanges, schools, businesses and recreational centres. This is a long term solution in decreasing car dependency, reducing air pollution and congestion on the roads.
- WP3, 4-6, concludes that further analysis on the impacts of the Distributor would need to be undertaken during detailed design. This is not convincing. According to the Environmental Impact Statement for the M5 East the morning peak hour speed along the corridor is 23.1 km/h. The Environmental Impact Statement forecasts that if the present trend proceeds, the average speed will reduce to 15.5 km/h by 2011. If the M5 proceeds the speed will increase to 16.7 km/h. There by potentially spending over \$600 million when there is negligible increase in amenity.

- The proposal does not accommodate the impacts of other transport development in the area.
- The proposal does not adequately answer the question of future east-west cross city link. This is a major point of contention of the South Sydney City Council submission and is reinforced in the Eastern Distributor Taskforce's submission.
- The proposal is unsympathetic to east-west movement, in particular the limit of only four crossings areas across the motorway will severely restrict pedestrian and cycle access.
- Appropriate searches for unhealthy building land declarations should be obtained by the proponent before construction commences.
- In the event of encountering contaminated soil, bore testing should be undertaken to determine the type of contamination and methods of mitigating the spread of contaminated dust, seepage or other escape of material from those contaminated sites.
- Findings of contaminated sites should be made public.
- Eastern Distributor Taskforce opposes the use of explosives in the tunnelling and excavation works.
- Eastern Distributor Taskforce endorses the formulation of a noise management plan and appointment of an acoustic consultant, but would seek input into who the consultant would be.
- Eastern Distributor Taskforce objects to proposed 24 hours a day tunnelling and haulage of excavated rock. This matter will be taken up with the Environment Protection Authority on noise and air pollution issues.
- Concerned about commencing loud construction activities from 7.00am.
- Concerned that general work hours are adhered to. Contractors rarely adhere to timings even when those timings from conditions of approval and non-compliance of which constitutes a breach of the EPPA. Work hours of 7.00am and 6.00pm weekdays and between 8.00am and 1.00pm Saturdays need to be adhered to, with an undertaking by the Environment Protection Authority that any reported breaches of these timings be immediately acted upon by the Environment Protection Authority or other authorities authorised under the Environmental Offences and Penalties Act. Failure to comply with noise regulations will be dealt with immediately.
- Loss of trees in the Drivers Triangle, Anzac Parade, Moore Park should be replaced on a 1 for 1 basis.
- Trees removed from Moore Park should be relocated to the new medium strip of the proposed motorway.

- The Eastern Distributor Taskforce's comments made on fauna are relevant in context to flora.
- Concerned over the quality of tree and other vegetation loss that would occur due to the proposal proceeding.
- The RTA has made no attempt to perform any study of the Regent Honeyeater. The Eastern Distributor Taskforce rejects the statement that the Regent Honeyeater must be considered a "rare visitor" to the Sydney Region. The Environmental Impact Statement relies on sporadic observation data in forming an opinion as to the distribution and quantity of a specific animal in an area. This data is dated and lacks thoroughness.
- Specific data on any animal in any one area is frequently sparse. The absence of scientific data is used as a justification for the belief that 'no occurrence' or 'rare occurrence' of a particular animal exists within any one area. A more detailed study frequently revises findings based on referential analysis as undertaken for the Environmental Impact Statement. In the absence of scientific data, statements such as "must be considered a rare visitor" can not be submitted to afford probative evidence upon which a determining authority can form such an opinion.
- Less than full scientific certainty is being used by the proponent in the case of the Green and Gold Bell Frog, the Regent Honeyeater and the Bush Stone-Curlew to justify postponing measures to prevent environmental degradation such as the loss of fauna habitat (precautionary principle).
- The Eastern Distributor Taskforce shall conduct its own studies of fauna at the nominated sites and report these findings to the Threatened Species Unit, NPWS.
- Section 99, NPWA provides the Director-General for National Parks a power of veto over this activity, as a licence under Section 120 may be required for the proposal to go ahead.
- Threatened Species Conservation Act 1995. The Green and Gold Bell Frog, Regent Honeyeater and Bush Stone-curlew are endangered species. the Eastern Distributor Taskforce rejects the assertion that "given the highly disturbed condition of the area to be directly affected by the proposed Eastern Distributor and the nature of the roadwork to be undertaken along Southern Cross Drive the proposal is unlikely to adversely affect this species. There is no apparent suitable habitat for this species. There is no apparent suitable habitat for this species along the alignment of Southern Cross Drive". There is no probative evidence provided to back this assertion.
- The RTA is not providing the determining authority with probative facts as to whether the area directly affected by the proposal is likely fauna habitat or contains these animals.
- The Eastern Distributor Taskforce rejects the statement "area directly affected by the proposal". Certain endangered habitats, such as along Southern Cross Drive, directly adjoin the "area affected by the proposal". This is against the spirit of the statutory object of the Environment Protection Authority Act, Section 112 (1B).

- The Environmental Impact Statement notes that the major based NSW transport strategies aim at "economic efficiency, environmental protection and social equity" in integrated transport planning. An important aim of the Draft State Road Network Strategy is to moderate traffic growth rather than satisfy unrestrained demand for travel. The Environmental Impact Statement point to the fact that motor traffic will increase and that the Eastern Distributor caters for this demand.
- Opposes to the proposal. If the proposal proceeds it reinforces community perceptions that the motor vehicle is the only convenient and efficient transport means.
- On environmental grounds, and current NSW government policy to develop a balanced transportation system this motorway should not be built. There were various transport and planning studies mentioned in the report and government's policy about providing a balanced transport system. This is acknowledged, but the proposal is based on an imbalanced view of transportation.

960. CULLEN Tony

- The proposal does not address east-west movements of people and traffic.
- The Tollway plaza below the Art Gallery is bad taste. The Finger Wharf to Cook and Phillip and Hyde Parks has the potential to be one of Sydney's great promenades. The construction of this proposal will compound what is already a congested and confused boulevard vector from Woolloomooloo to the War Memorial. The Eastern Distributor development in conjunction with "cleverly" designed trench tunnelling has the potential to return some heart and soul to the streetscape.
- The proposal does not establish design principles of unity, harmony and utility. This should be included in enlightened city and urban planning. The proposal does not create an "exciting and humanised city sector but carves the area up into cavernous ramparts" giving the car dominance at the expense of inhabitants and pedestrians.
- The Environmental Impact Statement cites the alienation and severance of Woolloomooloo, Surry Hills, Redfern and Kensington. The report fails to address adequately the immediate and prolonged social impacts the proposal will have on homes and families, on pedestrians and cyclists, on schools, on shops and businesses, on recreational facilities, on public transport, on community and city events.
- The Environmental Impact Statement provides a superficial and simplistic summary overview on the cumulative impacts on quality of life and livelihood (911-20/25). This falls short of meeting the points of concern raised by the Department of Urban Affairs and Planning in Appendices B and C. Social and Inter-generational Equity and ecologically sustainable matters are not adequately addressed.
- The proposal should liberate Taylor Square from all traffic. It is the city's most elevated public square and should be given the prominence it deserves. Oxford street linking

Taylor Square to Whitlam Square should be emptied of traffic and become a green boulevard.

961. COX Andrew

- Sydney should be reducing its dependence on cars and trucks. The government needs to avoid increasing personalised motor vehicles and heavy truck traffic. The Eastern Distributor does the opposite and draws people away from public transport and freight from rail.
- Improvements such as narrowing roads and introducing traffic calming to return space to pedestrians and cyclists is unlikely to occur because traffic on existing roads near the freeway will increase and progressively more land will be turned over for dominance by cars and trucks.
- There was insufficient time to respond to the Environmental Impact Statement, despite the extension to the 24 December. A large part of the exhibition corresponded with the holiday period and did not allow full public input into the proposal. The Environmental Impact Statement for the M5 also has insufficient time for comment and coincides with the holiday period.
- Opposed to Government spending on major infrastructure and to motorways which are privately funded that benefit motorists. Government should encourage or fund public transport and bicycle improvements rather than road projects. Government mappers to drivers with new or improved freeways rather than tackling the real cause of driver frustration and their perceived need for road improvements. To avoid this Government must present all the facts and options rather than being a mouthpiece for the RTA.
- Opposed to State and Federal Government hidden and secret financial arrangements providing incentives for the construction of freeway and tollway projects. This includes tax incentives, loan arrangements, secret contracts, compensation clauses if competing public transport is established, underwriting of risk and returns and other complex arrangements. Public land and money is being squandered with little accountability while providing questionable benefits.
- There has been no consideration given to providing safe routes for bicycles. Riding is dangerous and unattractive because drivers do not acknowledge cyclist rights and road planners pay little attention to cyclists. Government has not encouraged cycling as an alternative mode of transport. Cycling has benefits of reducing car travel and providing a cheap and healthy mode of transport.
- The proposal reduces the amenity of outdoor areas, such as Moore Park. Public open space is lost to the proposal. The use of the remaining land will become unhealthy due to increased noise, lower safety and increased air pollution. Rejects loss of public lands for the toll road, even for bus lanes.

- The construction of the Eastern Distributor will increase air pollution levels and the production of greenhouse gases. Reducing the number of car trips and truck trips is required to address these issues. The Eastern Distributor will make these reductions difficult and future generations will blame our generation for not addressing these issues.
- The proposal will increase traffic volumes on Cleveland Street as it becomes a major route linking the Eastern Distributor with Parramatta Road, City Road and the Western Distributor. This will increase the likelihood that at Cleveland Street additional turning lanes will be constructed, more no right turning restrictions will be established and the street will suffer increased use by heavy vehicles, lower air quality, increased noise and increased car passenger and pedestrian injuries and deaths. These factors are unacceptable to people who live, walk and work on or near Cleveland Street.
- The Eastern Distributor will draw people away from public transport and freight away from rail. The profitability of the existing rail routes and proposed and future routes (New Southern Rail, Sydney Light Rail, other potential tram routes, other rail extensions such as Bondi Junction/eastern beaches to airport) is reduced, making public transport options harder and more expensive to introduce.
- If the proposal will reduce levels of traffic on other roads surrounding the Eastern Distributor why is the width of the roads where traffic is claimed to be reduced not narrowed, traffic calming introduced and more space returned to pedestrian and cyclists.
- The construction of the Eastern Distributor is not ecologically sustainable. Providing incentives for truck and private car transport will cause detrimental impacts to present and future generations (including the effect of air quality reduction and increased greenhouse gas emissions.)

962. STRONG Rosalind (Heritage Council of New South Wales)

- There is inadequate assessment of the visual impact of the proposal. Such an assessment should include diagrams, photos and plans showing where the impacts will be and indicating how they will affect the heritage significance of nearby items.
- Concerned about the new administration block becoming a visual focal point for this precinct of the Royal Botanic Gardens and does not appear to be justified. In addition, there are no design guidelines given for this building and no sketch plans indicating its proposed bulk and visual sighting.
- Community consultation about heritage issues and with key stakeholders should be undertaken to determine the social values of the identified heritage items.
- The Heritage Office does not consider that the heritage impacts of the proposal have been adequately assessed in the Environmental Impact Statement.
- The overall impact of the proposal on heritage items and conservation areas will be such as to unacceptably reduce the significance of a large number of heritage items.

- There appear to be only preliminary assessments of the significance of heritage items affected by the Eastern Distributor. This makes it impossible to assess the real impacts of the development. Significance assessments should be prepared for each precinct and should include both individual buildings and items as well as streetscapes and heritage precincts.
- Overall, there is a lack of illustrative material, especially maps and plans, indicating the location of heritage items and the potential impacts on them.
- An archaeological assessment should be prepared as part of the Environmental Impact Statement to indicate zones of greatest archaeological potential and significance.
- Whilst the recommendations to prepare further conservation management plans should the proposal proceed is noted, much of the information it is proposed to include in these plans is required at the Environmental Impact Statement stage to determine the impact of the proposal on heritage items (in particular, significance, archaeological and visual assessments).
- A large number of heritage items will be adversely affected in the Palmer Street, Darlinghurst precinct and the proposal appears to involve at least some demolition as well as ongoing impacts from increased traffic and vibration. Some of these items and precincts are of heritage significance to the state. There is insufficient detailed information in the Environmental Impact Statement to be able to gauge the overall impact of work in this area.
- There is insufficient detail on the impact of the proposal on Busby's Bore. Any impacts or intrusion into the area around the Bore and its shafts requires the approval of the Heritage Council under Section 60 of the Heritage Act. In the interim, more detailed plans and a description of the expected impact should be prepared for the consideration by the Heritage Office.
- It is unclear whether or not the Moore Park Gate Post, perimeter fence and Anzac Memorial Obelisk are to be retained or moved in the Driver's Triangle area during development. As these items are significant items of moveable heritage, it is of concern that the exact impact of the proposal on them has not been determined. There are no separate assessments of significance or conservation policies identifying appropriate impacts for these items.
- The stability of buildings and potential impacts on structure at the Cleveland Street intersection (as with all the other precincts) should be identified and appropriate mitigative measures recommended.
- There is no indication of which of the fig trees will be removed during construction. Nor is there an indication of the impact this will have on the remaining monumental avenue plantings.

- I note with particular disgust that one of the outlets will be located very close to the SCEGGS school.
- An increase in noise pollution will occur on all roads feeding into the motorway and all sections of the motorway that are not in a tunnel.
- The explanation in the Environmental Impact Statement that noise pollution is already high and that the construction of the Eastern Distributor will make little difference is completely inadequate. Sydney noise pollution must be reduced and I feel the community should not be forced to suffer from constant roar traffic as a consequence of living in a large city.
- Complete inadequacy of the Environmental Impact Statement to properly deal with the impending oil crisis. What this means is that a transport system based largely on car and truck travel and perpetuated by the construction of new motorways, is hardly in a position to cope with such a decline in fuel supplies and the accompanying massive rise in the costs of petrol.
- It will make traffic problems worse, increasing the capacity of the road network only serves to encourage more cars onto the road. The claim that motorways relieve congestion and take traffic off local streets is false, as the increased traffic construction of such roads quickly fills the extra road space, as well as the roads that existed previously.

967. GUTHRIE Barbra and Maureen KINGSHOTT

- Preference for Government to explore options for improving public transport across and around the city;
- Building more freeways and tollways simply increases the volume of private traffic and promotes that form of travel;
- Support the extension of the tunnel from the Domain Tunnel to William Street and from Drivers Triangle to Link Road;
- Why reproduce on the eastern side of the city the ugly Los Angeles style road network that blights the western side?
- Increased visual pollution;
- The current proposal will:
 - ⇒ Alienate Woolloomooloo from the Art Gallery, the Domain, the Gardens and the city centre;
 - ⇒ Increase difficulty for pedestrians to move freely around between Woolloomooloo and the city; and

- If the Government believes the financial costs of the proposal to tunnel the distributor as suggested are too high, then we prefer the proposal to be cancelled.

968. CONOMES George

- There has been insufficient consideration and coordination of parking for the Sydney Football Stadium, Sydney Cricket Ground and Fox Studios. The RTA spokesman said that this was beyond their brief, a short-sighted view.
- There has been insufficient time to consider the implications of the Eastern Distributor.
- It is inequitable that areas affected by the roadway should bear the cost and be disfigured when the community as a whole should bear the cost.
- The extra cost of providing suitable solutions should be paid for by all motorists who use the facility by way of a toll and by way of car registration.
- There is only one solution for South Dowling Street and that is to extend the tunnel to Rosebery.
- The roadway will alienate surrounding areas.
- The loss of parkland is unacceptable.
- Eastern Distributor must have an entry in Moore Park Road (before Flinders Street) for westbound traffic. Without this entry the problem is only half-solved. It will avoid the disfigurement of Driver's Triangle and the demolition of trees and improve traffic flow from the east to the tunnel.
- A ten-lane road in South Dowling Street, with associated concrete structures and signage, will scar the landscape and is unacceptable.
- We are considering pulling down the Cahill Expressway at enormous cost. The Government and RTA are considering constructing another "Cahill Expressway" down South Dowling Street.

969. TURNER S John

- No consideration given to the opportunity for interconnections with an East-West tunnel under Park and William Streets of similar.
- No confidence that future traffic generators in the Moore Park area have been fully addressed.

- The intrusion of the development into Moore Park is of concern and this impact has not been adequately assessed in the Environmental Impact Statement.
- The Heritage Office does not consider that the heritage impacts of the Eastern Distributor proposal have been adequately assessed.
- There is no significance assessment of plantings or poplars or the impact that their removal will have on the visual qualities of this area.

963. MERTEL M

- Suggests provision of a 3 lane northbound tunnel under South Dowling Street with exits to Dacey Avenue and Moore Park Road if necessary. This allows the existing South Dowling Street to be rearranged to the following configuration:
 - ⇒ Four southbound lanes for through traffic from Flinders Street to Dacey Avenue, and three lanes to the airport exit;
 - ⇒ Underpasses at Cleveland Street and Dacey Avenue to Todman Avenue if required;
 - ⇒ Northbound lanes to Dacey Avenue and Lachlan Street intersection;
 - ⇒ Two northbound lanes north of Dacey Avenue, mainly for local access purposes.
- The existing landscaped road with its grassed median and palm trees should be retained.
- Northbound tunnel under South Dowling Street.

964. MERTELL W R

- Before 2000, construct the tunnels from Woolloomooloo to Anzac Parade, Moore Park Road and South Dowling Street.
- After 2000, construct a tunnel under South Dowling Street, south of Flinders Street to Dacey Avenue.
- Before 2000, construct an underpass in South Dowling Street at Dacey Avenue and Lachlan Street with a direct tunnel link to Dacey Avenue (North to East).
- Before 2000, close the Link Road Exit (North to West). Urban motorways must directly connect to Arterial roads, not local roads especially if it is the first northbound exit for over 5 kilometres.
- The County Road intersection (Dacey Avenue and Lachlan Street and McEvoy Street) is the first arterial road intersection after Southern Cross Drive and so it should be the first

exit from the proposed Motorway. There should not be an exit to Link Road, which is a local road, or to Todman Avenue or O'Dea Avenue which is a sub arterial road.

- There should be a direct tunnel connecting the northbound lanes of South Dowling Street to the Eastbound lanes of Dacey Avenue.
- The South Dowling Street section of the proposed motorway will be a bitumen and concrete wasteland devoid of any appropriate landscaping between kerbs of this proposed 10 lane road. It will be a runway of concrete and bitumen dividing a residential area from their parklands called Moore Park.
- The proposal to retain the existing sub-standard left turn into Link Road and incorporate this exit into the motorway proposal will lead to the development of an extremely hazardous rear-end accident situation. Vehicles travelling at high speed will be confronted with decelerating vehicles negotiating a 135 degree angle sharp left turn into Link Road.
- The proposed exit from a Motorway into Link Road is highly undesirable considering the downhill grade from Southern Cross Drive for northbound motorists.
- The deletion of the left turn into Link Road would permit the development of a standard freeway type exit arrangement for northbound traffic approaching the proposed grade separated intersection of O'Dea Avenue and Todman Avenue.
- Provision of a roundabout at Dacey Avenue, Lachlan Street and South Dowling Street should be considered above the proposed underpass instead of traffic signals.

965. MACDONALD Fiona (Darlinghurst Public School Parents and Citizens)

- Concerned that the proposed Distributor will adversely affect the safety of people attending the school. Concerned that there will be an increase in the traffic along Liverpool Street as motorists attempt to avoid paying the toll, especially those making short journeys from the eastern and southern suburbs of the city. The traffic is already high on Liverpool Street (15,000 vehicles per day). Assurance is sought that the traffic volumes will not increase along Liverpool Street as a result of the proposal.

966. GULSON Gus (Nature Conservation Council)

- The induced traffic effect will mean that more air pollution will occur due to increased number of cars on the road. The tunnel will do nothing to deal with the problem of cars and truck exhaust fumes, residents living in the vicinity of the proposed exhaust stack will experience a significant reduction in the quality of the air they breathe.
- Building new motorways results in significant decrease in the patronage of public transport. This is because people who were taking public transport switch to their cars to take advantage of (initially) improved traffic condition.

- The Environmental Impact Statement could make provision for the dedication of two lanes on Flinders and Oxford Street to light rail.
- The Environmental Impact Statement limits its assessment of improved public transport opportunities to buses (pages 5-21).
- The RTA proposal to develop a local road on the eastern side of Dowling Street, generally between Todman Avenue and Myrtle Street, to provide access to existing residential properties fronting Dowling Street is supported. The local road will have no connection to the proposed 3 lane southbound carriageway of the Motorway south of Milroy Avenue, Carminya Street, Winkurra Street, Baker Street and Myrtle Street. These local streets are no longer necessary and are proposed to be abandoned.
- A key justification for the Distributor is an assumed expansion of air traffic at Kingsford-Smith Airport from 18.1 million passenger movements in 1995 to 30 million by 2007 (Chapters 1-7). Council objects to any role planned for the Distributor in achieving an expansion of Kingsford-Smith Airport or its privatisation.
- Traffic volumes north of Cleveland Street will rise from 48,500 a day to 125,500. An increase of 258% by 2011. Clarification is required on how high traffic volumes will rise south of Cleveland Street.
- The Environmental Impact Statement has scant reference to the impact of the distributor on the integration of public transport with the New Southern Railway, particularly the proposed station at Green Square, and concludes that "planning by Sydney Buses to capitalise on these changes is at an early stage and would be considered in greater detail later".
- The Environmental Impact Statement does not seriously address ESD in Chapter 1, page 10. Recognised ESD principles such as the precautionary principle both for and intra/inter generational equity are only briefly referred to and a superficial assurance given that the "...principles of Ecologically Sustainable Development have been applied into the development of this proposal". Problems concerning air pollution, disposal of contaminated waste, predicted traffic volumes and future impact of the orbital road network would suggest that ESD principles have not been implemented.
- The proposal for closure of a one-way ramp off Southern Cross Drive at the western end of Ingram Street be approved in principle. Detailed consultation is required with Council regarding design and layout of the closure.
- The Environmental Impact Statement does not adequately consider possible interchange ramps at Gardeners Road which may relieve other possible adverse impacts of east-west traffic redistribution (such as Lenthall Street and Todman Avenue p10-25).
- Asks what will happen to contaminated cut and specifically rejects ocean disposal. The Distributor will go through old industrial sites and may unearth unmarked abandoned gas lines (possibly still full of a mixture of water, tar and P.A.H's).

- The operation of the Distributor's surface roads and tunnels must strictly adhere to appropriate air quality guidelines and construction work should not commence until it is shown how this will be technically achieved.
- The Environment Protection Authority has requested wind tunnel analysis to predict pollution patterns adjacent to ventilation outlets and results are not yet known. Air pollution issues in and surrounding the tunnels have not yet been fully explored and therefore the Environmental Impact Statement is inadequate until this is done.
- The Environmental Impact Statement discounts in one page the theory of large road works attracting additional traffic despite mentioning the SACTRA report which concluded that urban freeways generate their own congestion. Concerned that the Environmental Impact Statement has not properly addressed the problem of induce traffic. RTA's "Road Transport Future Directions" warns that if the RTA's freeway building policy continued for the next 25 years, there would be a 600% increase in traffic congestion, a 36% decline in air quality and a 23% increase in fuel consumption.
- The Environmental Impact Statement has arguably not adequately addressed some of the Director General requirements. These include:
 - ⇒ Consideration of various alternatives to manage the environmental impacts of the proposal.
 - ⇒ Examination of opportunities for the proposal to facilitate public transport.
 - ⇒ Identification of alternative non-tolled route and route for dangerous goods movements.
 - ⇒ Impacts on pedestrian and bicycle traffic and means of providing for their safe movements.
 - ⇒ Potential cumulative environmental impacts of the proposal with other transport developments in this region, including the M5 east and New Southern Railway, both during construction and operation.
 - ⇒ Outline of an environmental management plan.
 - ⇒ Impacts on areas or buildings of heritage or conservation value.
- Figure 5.7A from the Environmental Impact Statement suggests that because of lane configurations and the position of the toll booth, eastern suburbs travellers trying to reach either the Harbour Tunnel or Harbour Bridge will have little option but to pay the toll. The problem will be compounded with the half-closure of Bourke Street and Crown Street made two way. This could be argued as getting traffic off local street, but Bourke and Crown Streets should not be called local streets.

- Insufficient data available to determine the impact on local traffic in West Paddington, and on through traffic from Paddington to CBD. Suspect serious difficulties and prospective solutions have not yet been addressed.
- Eastern Distributor would become a major obstacle on regular cycling route through Woolloomooloo, between Paddington and north CBD and Harbour Bridge.
- Eastern Distributor would be a major obstacle on regular cycling route between Paddington and Brighton-Le-Sands.

970. GULSON Dianne

- The New Southern Railway may provide a service which may not be adequately patronised if the Distributor is built.
- Concerned that another major road will lead to an increase in traffic and therefore will increase air pollution which is damaging to the health of people along the route. It will increase greenhouse gas emissions.
- Considers that it is important that money is spent on improvements to public transport and facilities for pedestrians and cyclists and not on more roads.
- To reduce greenhouse gases Sydney needs people to use public transport.

971. FRY Rae

- Consulted the Environmental Impact Statement to find out what the noise increases at the Cleveland Street and South Dowling Street intersection would be. It appears the figures do not exist.
- There will be a loss of amenity due to the intersection at Cleveland Street and South Dowling Street. It will lead to loss of amenity for Moore Park, pedestrians, residents and will destroy the character of the area.
- Walking along South Dowling Street to Oxford Street is already bad. Have you ever tried walking along a motorway?
- Would rather live 50m from a light railway station, it would be a more sensible solution given the Fox Studios development. Its ridiculous to be increasing motor vehicle access to the inner city.

972. SAVAGE F M (Randwick City Council)

- Considers Government Policy has not been met (Chapters 5-15) and the Environmental Impact Statement is deficient in addressing it. A simplistic attempt is made to meet policy

by arguing that Sydney motorists would continue to use the Distributor for travel efficiency and that improvements to public transport and alternative fuelled vehicles would be able to use this facility. Travel efficiency is unlikely to occur in a fuel drought, improvements to public transport have not been built in to the Distributor and alternative vehicles are largely experimental.

- The Environmental Impact Statement's consideration of future fuel supplies is illogical (Chapters 5-15 & 17). No data appears to have been provided on when and how declining fuel supplies may be expected to affect usage of the Distributor and thus its future value to the community.
- No specific date is given for the first day of operation of the Distributor, just some time in "2011"(typo in submission?). Without one it is impossible to predict what will be the immediate impact on local roads around the project. Conversely, the Environmental Impact Statement for the M5 East revealed a predicted increase in local road traffic - the very opposite of what the Distributor is supposed to achieve. Council calls for predictions of traffic volumes at the time of the immediate opening of the Distributor.
- The Environmental Impact Statement is flawed by a number of peculiarities in expected traffic volumes. Oxford Street (West of Talyor Square) and Crown Street (between Devonshire and Foveaux) are alleged to show lower volumes in "high demand" scenarios than they do in "low demand" scenarios. Council asks for clarification of this confusion.
- The Environmental Impact Statement claims (1-7) that linking the Distributor up with a proposed future orbital road network surrounding Sydney is one of the main benefits that the project will provide. Have the predicted traffic volumes given in the Environmental Impact Statement for Randwick's area been calculated taking into account the consequential increases in traffic flowing into the Distributor from a completed orbital network.
- Traffic pressure would increase by 18% and would be felt at all intersections and feeder streets off Anzac Parade. Council does not accept such an increase in traffic or other major access routes such as Doncaster Avenue which is already heavily used.
- Asks for further explanation as to the level of disruption in public transport servicing Randwick residents during the building period and how it is going to be minimised.
- The Environmental Impact Statement claims there will be a boost for public transport (1-7) but the STA is reaudited to not want to divert more than 1 to 5% of their routes to it as the Distributor's bus stops are not where people want to go. Asks for a separate report from the STA with more detail on just how bus services in the Eastern Suburbs will be benefited by the Distributor and specific detail on proposed bus route amendments.
- The Environmental Impact Statement claims that public transport opportunities will be increased. Figure 5.7C shows part of the "Bus roadway" running along Anzac Parade will be removed thus blocking the light rail "corridors" running from Taylor Square down to Randwick Junction and La Perouse. Objects to the threat to proposed light rail and asks for the bus roadway to be maintained.

- Asks for confirmation on whether the M5 East proposal will also incorporate a toll for travellers going south. The combined effect would impact inequitably on Randwick residents travelling for work or holidays.
- Traffic diversions during the 24 month construction phase for tunnels in South Dowling Street between Todman Avenue and Dacey Avenue must be designed to ensure that no additional traffic is directed into Lenthall Street or Todman Avenue. Detailed analysis should be undertaken of proposed traffic routes during the two year construction period when northbound traffic is to be diverted off South Dowling Street. When traffic may be diverted via Lenthall Street and Todman Avenue onto Anzac Parade, alternative routes should be discussed and analysed in detail with Council prior to any temporary diversion of traffic during the construction phase. One alternative may be to make Bourke Street temporarily northbound during this period. Alternative routes should minimise traffic through Kensington and Kingsford as far as possible.
- Excavated material such as sandstone should be recycled and land filling be a disposal option of last resort.
- Noise reduction with appropriate landscape measures are considered essential along Dowling Street between Todman Avenue and Southern Cross Drive, Kensington.
- Noise reduction measures are considered essential along Dowling Street between Todman Avenue and Southern Cross Drive, Kensington. This will require detailed consultation between the RTA and Council and local residents to ensure that resident's amenity be maintained and improved.
- Little detail for treatment proposed for west Kensington is provided except a local access road and "potential sound walls".
- Supports the provision of a direct right turn link from the northbound lanes of South Dowling Street to east bound lanes of Moore Park Road. This will assist in ensuring that interregional traffic uses arterial roads instead of local roads in the Randwick area. This would eliminate several "rat runs" along existing local roads. Without this measure the Distributor will not be able to distribute traffic efficiently and directly from Southern Sydney to the central section of the Eastern Suburbs.
- Right hand turn into Moore Park would mean that a link between the Motorway and arterial roads is provided in the most direct manner. Currently traffic from the Airport and southern Sydney travelling to Bondi and surrounding suburbs is directed by signposting along a circuitous route via South Dowling Street, Cleveland Street, Anzac Parade and then has to wait at least 2 to 3 cycles of traffic lights at Anzac Parade to turn right into Moore Park. Instead motorists use other routes, including local roads, in Kensington, Randwick and Waverley due to poor connectivity to arterial roads.
- Request that the RTA make provision for a two way tunnel between Dacey Avenue and South Dowling Street (see diagram in submission). This would be the most appropriate measure to link the Eastern Distributor section of the Sydney Orbital Motorway to the major arterial roads, for example Anzac Parade and Alison Road. It is the only measure

which will be effective in reducing inter-regional traffic using local residential roads, especially in the Kensington and Randwick areas. The motorway proposal must incorporate appropriate traffic links which will distribute traffic leaving the motorway to arterial or sub-arterial roads. These links must be direct and convenient. It is inappropriate that motorists leaving a high standard motorway to travel over 1km along a 2 lane access and service road with three sets of traffic lights, in order to gain access to the first available arterial road junction.

- Without a direct tunnel link traffic will be discouraged from using Dacey Avenue. It will improve traffic delays and operation and efficiency of signals at the following intersections: Dacey and Lachlan, Todman and O'Dea and Cleveland (all intersections). East west flow in Cleveland at the intersection of South Dowling Street will be greatly improved as the demand for right turns (north to east) will be very low if a tunnel link is provided to and from Dacey.
- Dacey Avenue must remain the major access route for traffic travelling along Southern Cross Drive from the Southern Region to gain access to Centennial Park, Moore Park, Fox Studios, University of NSW, Clovelly, Coogee and Randwick. Following the completion of the M5 east extension, Dacey Avenue will become the major gateway to the Eastern Suburbs from not only Southern Sydney but also south-western Sydney.
- The existing County Road reservation of Dacey Avenue should be fully utilised to improve traffic flows at the Dacey Avenue and Lachlan Street and South Dowling Street intersections. In conjunction with grade separated intersections this will allow additional traffic lanes to be developed and facilitate the tunnel link supported by Council.
- Suggests that Dacey Avenue be extended by putting a fly-over at the Dacey Avenue/Alison Road/Anzac Parade intersection. This will improve traffic conditions at this intersection which will be subjected to additional traffic and will encourage motorists to use the arterial road network in lieu of local roads.
- The Link Road exit design is hazardous and should be deleted. The left turn into Link Road will lead to a rear-end accident situation. Motorists will be travelling at high speeds (80 km/hour) in a single lane departing the motorway and will be confronted with vehicles abruptly decelerating to less than 15 km/hour to negotiate the 135° angle left turn into Link Road.
- Providing an exit from a Motorway into a local road (Link Road) is highly undesirable due to the downhill grade from Southern Cross Drive for northbound traffic and the greatly increased flow of vehicles along the proposed Distributor.
- The deletion of the left turn would permit the development of a standard freeway type exit arrangement for northbound traffic approaching the proposed grade separated intersection of O'Dea Avenue and Todman Avenue. (sketch attached) This intersection is a classified sub-arterial road and should be the first northbound exit after Southern Cross Drive. Access to Zetland, Rosebery and Kensington is readily available via this proposed grade separated intersection.

- The on-ramp from Todman Avenue to the southbound lanes of the Distributor at Milroy Avenue and the provision of three southbound lanes in Dowling Street is supported. Careful consideration must be given to maintain safe traffic conditions at the existing vehicular access crossings between Todman Avenue and Milroy Avenue and also at the proposed junction of Milroy Avenue and the proposed local road.

973. BARAGWANATH E L

- Toll dodgers could add to existing traffic problems in the Woollahra and Paddington area.
- Proposed entry and exit configuration (Moore Park Road) would prove woefully inadequate.
- The planning approach to the determination of the likely flows to and from Moore Park Road and to the Distributor is flawed.
- The original conception was that the Eastern Distributor would have as its main functions the relief of traffic around Taylor Square and to take traffic away from the Woollahra and Paddington area. With only one single lane exit to and single lane entrance from Moore Park Road, it is very unlikely that there will be any alleviation.

974. MURRAY Shauna

- Air pollution and greenhouse gas emissions will be significantly increased due to the proposal.
- The only long term sustainable options for Sydney's future is light rail and better facilities for pedestrians and cyclists.
- Traffic will be travelling faster and noise pollution will significantly increase.
- Access to Moore Park for residents would be restricted and dangerous, especially for children. A footbridge is required for access.
- Inner city residents use public transport, walking and cycling for transport significantly more often than residents of outer suburbs. Yet it is these people who would have to suffer the detrimental consequences of air, noise and visual pollution due to residents of other suburbs using the Distributor.
- The Eastern Distributor will be in direct competition with the New Southern Railway. The New Southern Railway has been designed for reducing traffic to the airport. If a light rail system from the city to the Northern Beaches was built, this in conjunction with the New Southern Railway would eliminate the need for the Eastern Distributor. The improvement to rail facilities has not been openly discussed in conjunction with the Eastern Distributor.

- The proposal will increase traffic in the entire Surry Hills and Redfern area which has one of the highest amounts of traffic flow of any suburb. Local streets feeding the Distributor would increase.

975. THIRKETTLE Narelle (Ultimo Precinct Committee)

- Objects to any increase in the arterial use of Harris Street, particularly by heavy vehicles and dangerous goods. Dangerous goods should also be prohibited from Allen Street Glebe Island Bridge exit. The area is being redeveloped as a model for urban consolidation. Large residential blocks have been completed and further development applications have been approved. An Ultimo-Pyrmont Precinct Planning Study identified the need to address pedestrian importance, local traffic demand, the minimisation of an arterial function and the need to reduce the barrier effect of Harris Street in order to link the new communities and to reduce local vehicle movements in and out of the precinct and capacity problems. A traffic, transport and parking needs study has been undertaken for the area (Ultimo and Pyrmont Transport, Traffic and Parking Study Stage 1 and 2) which offers alternative routes for arterial traffic and recommends that Harris Street becomes a boulevard with traffic calming and that heavy southbound vehicles from Harris Street should be removed to another existing street. These issues should be considered in the planning stage of the Eastern Distributor to avoid worsening the identified problem of Harris Street. Recommends that the studies are reviewed.

976. SHARP Leith

- It is not proven that the proposed construction improvements to the Sydney Orbital Road System between the Cahill Expressway and the intersection of Southern Cross Drive will result in shorter journey time for vehicles travelling via this route to their destination. Bottlenecks in other areas of their journey will become more congested as more vehicles travel via this route as a reaction to the perceived travel time reductions.
- The noise pollution associated with the proposal has not been properly evaluated.
- The air pollution associated with the development has not been properly evaluated.
- The proposal contradicts Australia's greenhouse reduction obligations by propagating a car dependent transport system.
- The benefit will not significantly benefit the community of New South Wales University. Less than 15% of this population travel along this route and most of those travel using public transport.
- The development does not make a useful contribution towards meeting Sydney's transport requirements. This development is a business venture for the private sector at the expense of the public.

- The Distributor will diminish the opportunity to design and implement effective and efficient integrated transport services for Sydney by using vital resources to fund a short term, short sighted project.
- The impact of the development on cyclists has not been properly evaluated.
- The impact on pedestrians of the development has not been properly evaluated.
- The environmental impacts associated with the construction have not been properly evaluated.
- The Environmental Impact Statement is a poor grade product that has generally missed the point of an Environmental Impact Statement.
- The process of pushing the development through to completion has been unprofessional and compromised by the adoption of poorly informed decision making processes within impossible time constraints. The process should be well considered which draws on expertise available to identify true needs and true opportunities for meeting them.
- The impact of traffic diverting to other toll free routes has not been evaluated. This is likely to have a negative impact on areas in the inner city.

977. MURRAY C Stephen

- Overseas experience demonstrates that high volume tollways quickly fill to capacity. This would mean unacceptable levels of congestion noise and pollution along South Dowling Street. Concerned that traffic avoiding this congestion will use smaller local streets such as Nobbs Street, will feed unacceptably high levels of traffic onto Bourke Street and Crown Street.
- The proposal to expand South Dowling Street will erode the visual beauty of one of Sydney's gateways. The Sydney 2000 Olympics was the kick start for the Olympics and should not end up with an eyesore at the time of the Olympics when the city is being promoted to the world.
- A comprehensive traffic management plan is required to reduce through traffic in local streets in Surry Hills. There has been a decline in residential amenity due to lack of appropriate traffic management strategies. East-west flows of traffic with large north-south flows create serious bottlenecks, increased noise and pollution, and traffic and pedestrian accidents.
- The impact of the closure of Bourke Street at Oxford Street and the establishment of Bourke Street as a two-way local street has not been fully examined in the EIS. The Airport Motorway's LATM scheme in Appendix G of the report indicates that traffic may travel north along Bourke Street into Campbell and then right into Crown. In the absence of suitable traffic calming measures, Bourke Street has the potential of becoming congested, noisy and polluted. The EIS does not adequately consider the anticipated increases in traffic flows into Bourke Street from Cleveland Street as a result of the overall proposal. No rationale has been given for changes in traffic flow direction in Campbell Street as proposed in stage 3 in 1985 (Appendix F) and Airport Motorways' LATM proposal.
- The EIS contends that traffic in Bourke Street will fall slightly up to 2011. This is unlikely due to traffic tendency to fill the available road space. The following issues have not been addressed in the EIS: where the traffic will come from and to what extent large residential developments to the south of Surry Hills contribute to increased traffic volumes on Crown and Bourke Streets; and the EIS avoids addressing the likely impacts of increased northbound flows along Crown and Bourke Streets as a result of motorists avoiding the tollgates.
- The overall scale of the proposal appears over-engineered and will result in unacceptable high levels of traffic through the inner city communities of Surry Hills, Redfern and Woolloomooloo.
- The longer term benefits to the local community of a tunnel extending to the vicinity of South Dowling Street and Todman Avenue include the retention of open space, an increase in visual amenity, reduction in traffic noise and pollution, and enhancement of pedestrian access and safety.
- The loss of open space as a result of the proposal is unacceptable.

- Concerned about the impact of the raised carriageway in the vicinity of the Art Gallery through one of Sydney's and Australia's most significant historical areas. As the concept of heritage continues to strengthen as a key issue in the planning process, it is disappointing to see that this proposal compromises heritage, social and biophysical amenity.
- The proposal fails to provide adequate pedestrian access to Moore Park. Many people, particularly the aged, already have difficulty in gaining access to the Park.

978. CONOMOS Efe

- The community is "up in arms" about the proposal as the present proposal has been on and off again, and is now being pushed through urgently but it does not address many existing problems dealing with traffic.
- Traffic from Moore Park venues create a traffic problem in Moore Park Road. The tunnel exit beyond Greens Road has not taken into account how motorists from the north, who use the tunnel along Moore Park Road to Greens Road, will be able to turn right to access the above venues.
- Concerned about the volume of traffic which will be imposed on Moore Park Road. Traffic is being shifted from Taylor Square to Moore Park Road.
- Concerned about the pollution and noise from traffic that will be generated in Moore Park Road.
- Objects to the visual impact of concrete ramps and walls of the above ground sections of the Distributor, especially South Dowling Street.
- The conditions which will be imposed on Moore Park Road residents will become unbearable. People will leave their historic homes and their upkeep of these heritage houses will deteriorate as they will be occupied by tenants.
- Concerned that there will be a loss of Moore Park and that it will be sold for roadway.
- The entrance of traffic to the north of Drivers Triangle is inappropriate considering the densely populated area. The facility should be moved to Link Road where it would not implicate as many people and heritage homes.

979. MURPHY Vincent

- The freeway should be roofed over between The Domain and the Botanic Gardens. This historic connection should be reinstated and be a priority for Sydney 2000. This is a better option than placing the freeway underground at Circular Quay.

980. SPEER Milton and Donna CAMPBELL

- Currently, it is possible to reach Moore Park by crossing South Dowling Street at any point along it. However, the current proposal limits access to the eastern side of the motorway via overpasses at the Drivers Triangle and also at Cleveland Street. Providing overpasses along South Dowling Street at selected points would create the following problems: 1) The overpass structures would necessarily be intrusive to their immediate environment on the residential side of South Dowling Street owing to the small incline required for wheel-chair access; and 2) Pedestrian traffic from the SFS and SCG and Fox Entertainment Park would be directed into fewer residential streets than currently, where the overpasses are located.
- On the current proposal, access and exit points from the motorway are provided at Drivers Triangle and Cleveland Street. A two-lane local road over this distance on the Moore Park side seems unnecessary.
- The tunnel should be extended from The Domain Tunnel to Link Road as it will improve amenity for residents in Surry Hills, Redfern and Woolloomooloo by reducing current noise levels for residents and the Art Gallery, and Moore Park will be preserved and enhanced.

981. BRETT F J

- An elevated roadway structure would be an aesthetic disaster. Sydney city is already defaced with eyesore features such as Darling Harbour, Cahill Expressway, Parramatta M4 and pedestrian footbridges with glaring advertisements. RTA should correct these errors and not exacerbate them.
- Parkland should be treated as inviolate. Land required for roads should be obtained by demolition of buildings. Not one square metre of park should be converted to road use.
- The road authority is not responsible for motorway access to privately owned shopping complexes. The building has no architectural value and should be adjusted if this is required for benefit to road geometry.
- What factors have been taken into consideration in the comfort and quality of travel for drivers and passengers in tunnels? What can be done to make the operation less claustrophobic?
- The time allowed for community consultation of the EIS is abysmally short. Further opportunity should be provided when the results of the initial community input have been published.
- Value should be assigned to subsurface strata. Demand is high for space for underground services. An underground motorway will sterilise strata from alternate uses and opportunity costs need to be shown.

982. SOMERVILLE T Richard

- Opposed to an elevated roadway and toll booths adjacent to the Art Gallery as it would visually impact the beautiful and historic landscapes on inner city cove to the Botanic Gardens.
- Nations like Australia should make efforts to reduce car usage to set an example to emerging nations to avoid a world pollution disaster which would result from general massive car usage in the next century. There are also a number of irresponsible drivers who suffer "road rage" and speed on roads has become a problem. Cars should be discouraged.
- Opposed to the construction of more high speed roads in the Sydney metropolitan areas as they encourage extravagant use of cars, cause clogging of local roads, create more air and noise pollution, lead to increased accidents which result in ill health, deaths and consequent increase in police, ambulance, medical, hospital, insurance and court costs, and worsening inflation and increasing national debt. Long term planning and preventive measures should be put into place to reduce road carnage and inflation. Two generations who have grown up since WW2 have only known an inflationist society but we should regain foresight and establish comprehensive planning and preventative measures. Efforts must be put into place to reduce car usage to avoid a world pollution disaster and there is a growing number of irresponsible and dangerous people driving cars. Drivers also are increasing their speed. The abolition of the Income Tax Advantage with car and salary packages would reduce daily use of cars.
- The second airport should be built north of Goulburn and the MAGLEV train introduced. This site could become Sydney's main international and domestic airport. The MAGLEV would eliminate most car trips and all passenger flights between Canberra and Sydney.
- Money should not be spent on further tollway construction. The cost of private tollways will be spread on to all consumers in the price of groceries and other goods, and services via general inflation. Money should instead be directed to restricting development at Circular Quay, creating more parkland, stopping growth of Sydney, public transport developments such as trains (new southern railway and Bondi Junction railway via Randwick racecourse, the University of NSW and Prince of Wales Hospital to Kingsford), buses and trams. Deplores the piecemeal approach to planning.

983. THE Residents of Thurlow Street

- Thurlow Street residents were not consulted on the proposed opening of Thurlow Street to South Dowling Street. The access centre were not able to provide definitive answers and, on being referred to South Sydney Council, they have no details of the proposal.
- Objects to the opening of Thurlow Street to South Dowling Street and the closure of Maddison Street to through traffic. Thurlow Street is currently closed and this contributes

to the quality of life of residents. The current proposal would increase traffic, pollution, danger, noise, exacerbate parking problems, and access for local residents and businesses would be restricted.

984. TZANNES Peter

- The RTA need to create proper north-south and east-west traffic flows. It should not be driven by the developer and the need to funnel vehicles through the toll booths.
- Dispersal of large numbers of vehicles and people from these sites must be given special attention. The traffic generated will be massive. Special care must be taken to ensure that Centennial Park itself is protected from the massive vehicle invasion.
- The present plan has no east-west link. Moore Park Road is the main road running east-west. It should be linked to South Dowling Street via a tunnel, thus freeing up the surface roads.
- Pressure should be taken off Moore Park Road by creating favourable traffic conditions along Oxford and William Streets. Oxford and William Streets should have tunnel links to the Eastern Distributor.
- The Moore Park Road tunnel opening should be located east of Driver Avenue and should be both the exit and entry points for the tunnel. This would allow traffic approaching the SFS, Cricket Ground and Fox Entertainment Park to use Greens Road and cross Moore Park Road to gain access to this busy area. The Anzac Parade tunnel entry and exit points should be together well south of the Moore Park Road intersection. The tunnel should be designed to be the main link to the SFS, Cricket Ground and Fox Entertainment Park.
- Bob Carr promised a toll-free Eastern Distributor. Should leave the private sector budget at \$600M and have the State Government add those monies necessary to solve the traffic problems of eastern Sydney.
- The intersection of Moore Park Road and Anzac Parade should be people friendly. Thousands of pedestrians visiting or leaving the main entertainment complexes need to cross this busy area.
- The design of the Eastern Distributor will cause residents in Surry Hills, Redfern and Kensington to be alienated from Moore Park.
- Concerned about the suggestion of screening classic terrace houses with concrete slabs to decrease the sound of the expressway.
- The Eastern Distributor should be tunnelled from Art Gallery Road through to and underneath South Dowling Street to Link Road.

985. COUPE S J

- According to the EPA Director's requirements, predicted traffic volumes were requested on a 5, 10, 15 and 20 year growth pattern. These were not made available in the EIS. Does this mean that this type of modelling was not undertaken? Was the correct approach even taken?
- Feels the Eastern Distributor will cause a merging of traffic congestion from the northern side of the bridge to the southern. With the link to the M5 East, surely traffic volumes are going to increase dramatically. Similar to the problems incurred with M25 in London, believe that the predicted usage of the Eastern Distributor has been grossly underestimated.
- Amenity will be adversely affected in terms of normal everyday living. This will include commuting to work, walking to the City and the Opera House, not to mention the disturbance of the view from apartment windows. There is an opportunity to repair the environmental damage caused to Woolloomooloo and South Dowling Street, this should not be ignored.
- The Environmental Protection Authority has requested that traffic volumes be predicted for a 5, 10, 15 and 20 year growth pattern. This does not seem to be evident in the EIS.
- This unacceptable, short-sighted, half baked solution to a traffic problem should not be forced through for the sake of the Sydney 2000 Olympics. Surely, the people of Sydney have and deserve a chance to repair the past environmental damage. Environmental damage should not be part of a 'green games'.

986. MOORE Greg

- The proposal is flawed because it fails to adequately address the needs of motorists travelling north, wishing to access the Eastern Suburbs during construction and operation. The problems of traffic exiting South Dowling Street into Link Road and then Lenthall Street, Todman Avenue and Doncaster Avenue have increased significantly in recent years. Further increase will place unacceptable burdens in the West Kensington area. The RTA should encourage the use of state roads and discourage the use of local roads in residential areas. Motorists must be provided with simple and unhindered access to their destinations. Options which require further investigation are: closure of Link Road to northbound traffic, make Dacey Avenue the main northbound exit to the east and make O'Dea Avenue the main northbound exit to the west.

987. ERMACORA Larry

- Supports the Sydney City Council's suggestion that the toll road should be a tunnel instead of an open cut through Woolloomooloo. This would allow an improvement in urban design to be achieved. It would reduce the visual impact through a heritage suburb, not hem in the CBD and would not devalue areas it went through.

- The residents of Palmer Street, East Sydney have endured many years of increasing traffic flow and, although it is stressed that the objectives of the Project include the reduction of traffic on local roads and the improvement of public transport, the residents are concerned as to whether or not these objectives will be met.
- They would prefer that the ventilation shaft on the corner of Stanley and Palmer Streets be placed elsewhere as presently it will be located close to their houses. They are concerned with the aesthetics of the stacks, and possible air and noise quality problems related with their functioning.
- The improvement of north/south traffic should not be at the expense of the east/west traffic flow. Ideally, the Eastern Distributor should be integrated with other proposed measures designed to remove traffic from all surface level streets in the City.
- It is suspected that motorists trying to avoid paying the toll will attempt to use local streets. In particular, the toll being collected at the northbound off-ramp in Palmer Street may pose a problem. It is therefore vital the "No Right Turn" from Oxford Street to Palmer Street remain in place. We fail to see the necessity for traffic signals at this intersection as proposed.
- Concerned about the on street parking on Palmer Street, ie will there be any measures to restore this parking once the project is complete.

1000. DE'HAAS Yvonne

- Would like to see traffic calming or control in Foveaux Street.
- Thinks toll should be collected in the southbound lanes and the Eastern Distributor lanes should be isolated so the toll could be added to the Harbour Bridge toll and collected once.
- Concerned that residents will be cut off from Moore Park if there is ten lanes of traffic on South Dowling Street. Thinks that this section of the Distributor should be underground.
- Concerned that there will be an increase in heavy vehicles using Foveaux Street and these vehicles will add to the existing noise levels.
- With the development of Fox Studios they are concerned about extra traffic both vehicular and pedestrian along Foveaux Street.

1002. DYER Geoff

- Concerned that the motorway ramps are located to the left of the access lanes. This requires cyclists to change lanes in order to stay in the kerbside lane.

- In option 3 the option is simple: slip lanes can be provided for cyclists across the roof of each portal structure, so that cyclists can gain direct access to the kerbside lane without crossing the entry and exit ramps.
- This would be more difficult for option 4. The southbound motorway lanes should be swung slightly to the west to allow the surface lane to join on the left.
- Whatever the option, there must be safe, convenient, high capacity provision for cyclists.
- The improvements to Mill Pond Road and its intersections with Botany Road and General Holmes Drive should not be dependent upon this project.

1003. WILLIAMS Neville

- Wants compensation whilst construction is taking place under his home.
- Opposed to the location of the exhaust stacks.
- Expects compensation if stacks near residents etc.
- Has been impressed at the wide range of locations at which to enquire about the Eastern Distributor. Impressed with the Community Access Centre.

1004. ANONYMOUS

- The proposal needs further development at Woolloomooloo and south of Drivers Triangle.
- Concerned as to why the proposed cost is so high when alternatives have costed at 20% - 30% of the RTA's cost.
- Edmond Capon's capping over Woolloomooloo expressway is a good idea and provides a good pedestrian link from the city and The Domain to Botanic Gardens and Woolloomooloo. The Finger Wharf development and Woolloomooloo could benefit with lower noise levels and safer pedestrian access to the city.
- Believes that the a traffic management program should be implemented to stop traffic problems on Anzac Parade.
- Concerned that the proposal does not provide noise abatement south of the Drivers Triangle.
- A tunnel south of the Drivers Triangle would reduce noise and pollution. It would also provide safe pedestrian access to Moore Park from the Surry Hills side of South Dowling Street.

- The design should allow for tunnelling connections to be made with the proposed east-west cross-city tunnel and for its extension under William Street, facilitating the William Street boulevard.
- Sydney's reputation as a beautiful world city should be maintained by keeping Los Angeles style motorways out of its centre. It would cost more money to do this but the returns would be immense.
- The proposal would make walking to the city, The Domain and Botanical Gardens from Woolloomooloo difficult. This would diminish the appeal of the location of Woolloomooloo. Before the proposal they were considering selling the car as it is possible to walk to amenities in the city from Woolloomooloo.
- The tollroad will attract more traffic. The amount of car fumes settling in the Woolloomooloo valley would make it an unhealthy area to be living in. With traffic in tunnels there is an opportunity that fumes could be treated before they are released into the atmosphere.

988. OLIVERI Emanuelli

- Concerned about the location of the ventilation shaft (northern) as it has dangerous pollution. The shaft should be placed away from residential areas and filtered to zero emissions.
- Concerned about the pollution from the northern portal. There is no analysis of other pollutants (rubber, asbestos, lead and noise). The portal should be moved away from residential areas.
- The proposed exit ramp for northbound traffic from the main tunnel to William Street should be reconsidered. It will cause noise and pollution from the portals. It will impact on amenities, access, footpaths, trees, sound barriers and aesthetical impact on heritage listed properties.

989. EARL LC and JW

- Concerned about the location of the southern ventilation stack on the corner of South Dowling and Flinders Streets. This is located in a high density residential area. The emissions from the stack will have adverse effects on the health and well being of the residents. The deterioration in air quality will affect resident's ability to enjoy their homes and surrounding area. Residents will suffer increase in dirt and dust which will occur as a result of heavier particles in emissions settling close to the stack. Does not accept statements in the EIS that emission levels will be within safe environmental levels as the current emissions from the Sydney Harbour Tunnel exceed those forecast in the EIS for the tunnel.

- The alternative site in Moore Park is not ideal for the ventilation stack but it is more acceptable than the current proposal for southern ventilation stack.

990. WILSON Murray

- where are noise barriers to be built?
- proximity of ramp to the property and the associated noise and vibration;
- insufficient planning is apparent with the lack of information being available to members of the public;
- what proportion of the traffic projection will be commercial?
- Sydney Olympics used as a reason to 'steamroll' this proposal through;
- exhaust emissions affecting the occupants of Kidman Terrace;
- off ramp to William Street is directly behind Kidman Terrace, owner fears loss of privacy;
- property not livable with the projected volume of traffic at such close proximity;
- why is compensation not considered?

992. STATTIN Lennart

- The proposed motorway will lead to division of communities.
- The proposed motorway will cause severe local traffic problems.
- The proposed motorway will be an aesthetic eyesore.
- The proposed motorway will cause foundation problems to older buildings.
- The proposed motorway will cause excessive fumes from the doubling of traffic.
- Residents along the route will suffer a doubling of through traffic to ensure that car commuters have a cheap fast road. A living inner city cannot be created with toxic fumes and excessive traffic.
- The tollroad should be tunnelled from the Harbour Tunnel to past Moore Park. The tunnel would address reclaimed residential and/or business land areas, lower traffic noise, reduce vibration and house damage, extraction fans can contain cleaning devices and the tunnel will promote/create a more livable inner city.

- The tollroad is a second rate road system which is being built for the Olympic Games. The tollway is based on little foresight and planning, and giving in to ease of construction with maximum profit to the tollway operator.
- The extra tunnelling cost can be paid for by a levy on petrol. The user should pay.

993. MAHONEY Kevin

- The design should not jeopardise the possibility of a William Street boulevard.
- Requests that road areas are reduced on surface routes above the tunnels allowing recreational use such as cafes and park areas at Taylor Square.
- Schemes should be in place to stop through traffic using local streets.
- The tunnel should be extended from Drivers Triangle to Link Road.
- The road should be tunnelled from the Harbour Tunnel beyond Moore Park.

994. MAHONEY J Ronda

- Ensure design of the Eastern Distributor allows for the extension under William Street facilitating the William Street boulevard.
- Extend tunnel for the Eastern Distributor from the Harbour Tunnel to beyond Moore Park.

995. TOWERS Marion

- Schemes should be put in place to ensure to stop through traffic using local streets.
- Ensure road areas on surface routes above the tunnel be reduced allowing recreational use.
- Ensure design of the Eastern Distributor does not jeopardise the possibility of a William Street boulevard.
- It is recommended that the tunnel for the Eastern Distributor be extended from the Harbour Tunnel to beyond Moore Park.

996. SARIKAKIS Andrew and Brett BOON

- concern over the southern ventilation shaft, as it is relatively close to the residents balcony;
- lack of acknowledgment by EIS of proximity of residential properties to the shaft;

- consider relocating to Moore Park away from residential properties.

997. SERAFIM John

- poor detail available for Distributor in presented material;
- reject the change of traffic flows resulting in two street closures in Bourke Street, Taylor Square and a portion of Crown Street being one-way with the balance being two-way;
- support the one-way flow to at least Oxford Street;
- reject two-way flow in Bourke Street, support one-way from Woolloomooloo south;
- proposal would create gridlock around Drivers Triangle;
- believe the existing traffic arrangements in Bourke Street, Crown Street and Campbell Street better serve the area, whilst synchronising the traffic signals would improve traffic flow;
- not had enough consultation nor easy access to clear and concise data during the lead up period;
- the Eastern Distributor should be an underground tunnel from The Domain Tunnel to Todman Avenue, Kensington;
- see the benefit of building the Market Street tunnel as the inner city east/west link.

998. SAUNDERS Kevin

- RTA not accountable for its part in poor urban management, needs to be a fundamental change in how city is planned and managed;
- better design solution (tunnel extension) for Woolloomooloo and Moore Park ends of project;
- amount of funds being allocated for local area improvement is grossly inadequate;
- major issues have not been addressed or have been dealt with in a shallow fashion. This includes demand management, urban design, impact on land uses, public transport and environmental externalities.

999. MICHIE Chris and Lindsay

- In section 6.2.4 of the EIS Botany residents have mentioned the use of unused rail networks and split loads.
- Requests adequate notice of local traffic management studies and other consultations.
- Traffic levels have changed since noise readings were taken in December 1995.
- There is potential for a huge increase in noise pollution despite the stated goals.
- There is no indication of noise test south of Cleveland Street in South Dowling Street where traffic is probably heaviest.
- Concerned that air and noise pollutants will be over EPA, WHO and ISO standards.
- In section 7.2.7 of the EIS the landscape strategy should include East Redfern and Waterloo in precinct Drivers Triangle to Epsom Road.
- Does not agree with 7.11 in the EIS that views from Moore Park to the motorway should be screened to protect park amenity through techniques such as screening, changes of level and walling.
- Tree planting program should not be undertaken by people from other environments.
- There are no tests for PM 10.
- There are no air tests south of Cleveland Street where traffic is probably heaviest.
- The shunting of traffic from different types of arterial roads to the Eastern Distributor seems socially unacceptable.
- The design places breakdown bays outside residences. Favouring the golf course, the Supa Centa and apartment buildings with high facades would not be so affected by breakdown bays.
- Agrees in section 5.3.1 of the EIS that heavy vehicles should not be travelling down residential streets but some through traffic would be residents taking their own journeys. Too much closing off of roads could restrict business, including passing trade. Providing reasonable access is important.
- The "improvements" and "upgrading" of South Dowling Street will turn it from a main arterial/main road to a highway.
- There is potential for increased air pollution despite stated goals. Suspect that air pollutants are over EPA, WHO and ISO standards. Can not see how future pollutants can be predicted to be within EPA standards and one hour pollutant levels vary.

- There has been an increase in freight traffic using South Dowling Street and Cleveland Street as part of the route to the west. This has been since the Eastern Distributor was announced.
- The use of Botany Road for road freight would improve the road system. This would connect Gardeners Road to Princess Highway, and connect Port Botany to Foreshore Road and Victoria Road. The residential areas along Botany Road have been recently built and should have been designed to cope with road traffic noise. Future developments along this route can be designed for noise minimisation.
- Section 5.2.3 of the EIS notes that heavy goods vehicles using the Eastern Distributor is a small proportion of vehicles using the Eastern Distributor corridor. It is considered that there is a large number of heavy vehicles using this corridor, especially vehicles travelling north and turning into Cleveland Street. Heavy vehicles should not be using South Dowling Street and Cleveland Street route as it has health impacts for residents.
- In addition to section 3.3.3 of the EIS, residents of East Redfern would be disadvantaged by the proposal with loss of amenity, access to park not possible, limited access to Oxford Street and access to other districts if there is no tunnel.
- The design will probably relieve traffic congestion in Oxford Street but will cause problems at Cleveland Street/South Dowling Street intersection. This area is heavily used by pedestrians.

1007. HUNTER Glen

- The construction of the Eastern Distributor will reduce parklands in the area in which it would be built and will create visual intrusion.
- From my examination of this proposal, I am convinced that the construction of this roadway would generate increased traffic volumes in the area that it serves.
- There is already widespread recognition of the need to reduce car usage and increase public transport usage (eg NRMA Clean Air 2000 Campaign); so there is no sense in constructing another motorway which will only provide increased road capacity and hence encourage more traffic.
- I urge you to reject the proposal to construct the Eastern Distributor and instead invest the available funds into public transport project that will reduce demand for road space and create a more livable city.
- Further the construction of the Eastern Distributor will result in increased air pollution, greenhouse gases and noise.

1008. ILLEGIBLE Andrew

- Another possible alternative is to provide the motorway east of South Dowling Street. This would separate fast and slow traffic and allow more public transport options.
- Development of the local area may produce extra pedestrian traffic in the vicinity of Moore Park and thus the tunnel solution may be appropriate.
- To help with the extra cost of this solution, the air space above the tunnel could be developed and a residential road built in this area to accompany this development. The Moore Park gardens area may provide an opportunity to build residential apartments or a tourist hotel.

1005. ADAMSON Erica

- The impact of removing pedestrian access on this community and others from outside the immediate area who use Moore Park (like myself, a member of the Surry Hills Running Club, who has been running across to Moore Park and Centennial Park and back every week for over eight years) was not adequately considered in the EIS.
- The exiting level amenity must be maintained by provision of a pedestrian and bike overpass across the proposed South Dowling Street section of the Eastern Distributor. This would be a small cost in comparison with the cost of the project and is essential to maintain access to open space and recreation for residents and visitors to the inner city. A better solution would be to extend the tunnel south to Cleveland Street.
- Existing pedestrian crossing on South Dowling Street between Cleveland Street and Drivers Triangle will be removed, and will not be replaced with any form of pedestrian access. This is unacceptable as loss of pedestrian access will divorce residents of Surry Hills from recreation space and make the park unattractive and unsafe to pedestrians by reducing possible lines of exit from the park.
- South Dowling Street is currently easily, safely and frequently crossed by pedestrians along this length as the median strip is very large and the gaps in the traffic arising from phasing of traffic light are considerable. The pedestrian crossing is also heavily used by those who do not wish to take risks and students attending Sydney High School.
- The proposal should be amended to increase the length of tunnel to Cleveland Street in the south and to whatever position is required to protect the amenity of Woolloomooloo and The Domain at the north.
- The impact of the current proposal on the aesthetics and amenity of Moore Park at the southern interface and Woolloomooloo, the Art Gallery and The Domain at the northern interface are unacceptable. The negative aesthetic impact of divisive Los Angeles style road development on two attractive areas of Sydney has not been adequately considered in the EIS. The fact that major roads already exist in these areas is not an appropriate reason to make the aesthetic impact of the roads far worse as it would be under the current Eastern Distributor proposal.

1006. ATKINSON Marie

- There has been anomalies in the information given in community consultation. Same questions have been asked with different answers. There has been lack of time for consultations.
- The press has been meagre and there has been some inaccurate reports.
- The level of support for the proposal indicated in section 3.1.1 of the EIS would probably be from people who have been led to expect benefits. Some people at the time would of had no idea what was actually planned near Woolloomooloo, Surry Hills, East Redfern and Waterloo.
- Emergency service access is important as some present street closures did not cope with this.
- The proposal will increase risk with so much traffic close to houses. Since the Eastern Distributor announcements there has been weekend tailgating accidents and shrub and fence damage. Collisions have occurred between Cleveland and Maddison Streets.
- Previous announcements have lead residents in the Surry Hills and East Redfern area to have a reasonable expectation of improvement in the design of South Dowling Street such as turning into a boulevard with tree plantings.
- Earth sculpture on the corner of Dacey Avenue at the ACI building site is not necessary. The ACI building is acceptable.
- Tunnel extension along South Dowling Street would improve surface traffic.
- The design of the above ground parts of the proposal would place 8-9-10 lanes of traffic directly outside residential houses. These lanes would be used in peak times. Peak times are not necessarily as indicated in the EIS as it may be all afternoon or weekends.
- In section 6.4.7 of the EIS is there consideration of freight diversion and buses in option SDS1?
- The design severs Moore Park from residential areas of Surry Hills and East Redfern as the road will be uncrossable with the removal of the median strip. New developments will increase the population in the area. Overpasses and underpasses previously studied and rejected. Having a view to the park is psychologically beneficial rather than being shut in.
- In section 3.3.4 the preference option that the community has requested a tunnel from Woolloomooloo to Link Road, Rosebery. Some Kensington people apparently expressed a need for a tunnel but a little more leeway for noise mitigation in that part of Dowling Street.

- Tunnel below and/or roof over The Domain cut.
- Plan for the Eastern Distributor to link to the Harbour Tunnel so that eventually the Cahill Expressway can be demolished and a new east-west link under the city built later.
- Do not locate toll plaza behind the Art Gallery. Perhaps relocate it to the southern entrance to the tunnel.
- Tunnel the expressway for the entire length of South Dowling Street.
- We have an opportunity now to correct some of the bad planning mistakes of the past and to build something of vision that will serve as well into the next century. We should build something that unifies the city, not divide it (by 10 lanes of traffic); something that restores the historical settings and lay out the city, by unifying The Domain and Woolloomooloo.

1009. GATES Tim

- The fifth objective outlined by the EIS was to identify and document opportunities created by the proposal to improve the quality of life for residents, workers and visitors to the inner city area of Sydney. This is not going to be achieved by this proposal.
- Design objectives for the Eastern Distributor were develop by the RTA in conjunction with the Centennial Park and Moore Park Trust, Randwick City Council and South Sydney Council. The objectives were to define an appropriate urban design and landscape strategy that:
 - i. protects the natural values of Moore Park;
 - ii. mitigates the impact of the Eastern Distributor on Moore Park, including any loss of significant vegetation or playing fields;
 - iii. create the exciting gateway for motorists entering Sydney;
 - iv. mitigate as far as possible any perceived adverse effect on the surrounding areas.
- All of these objective listed above will not be met by this proposal.
- The character of Surry Hills east is stated as being "separated from Moore Park and adjoining parkland areas by the traffic volumes along South Dowling Street which acts as a barrier to pedestrian movement to the park". This is going to be made worse by the proposal.
- One of the adopted objectives for pedestrians and cyclists for the Distributor is "maintaining or preferably improving pedestrian facilities for crossing the Eastern Distributor. However, in fact, on page 7-7 the removal of an existing pedestrian crossing midway between Fitzroy Street and Cleveland Street is mentioned and page 10-13 refers

to" formal and informal midblock crossing of South Dowling Street to Moore Park would be removed north of Cleveland Street. The removal of the median strips on South Dowling Street would eliminate uncontrolled midblock crossing which may improve safety but cause some inconvenience. Therefore, access to Moore Park is not going to be improved by this proposal.

- The impacts of the proposal on residential amenity would be to these residents located immediately adjoining the motorway. Potential impacts would variously include traffic noise and vibration; air quality impact of the motorway elements such as toll plazas, ventilation shafts and noise barriers.
- Most of the problems in this proposal can be resolved by the alternative proposal, which was adopted by tunnelling.
- It would be a pity if the threat of 2000 Olympic deadline were to subject existing and future generation of residents of these suburbs to dislocation via 1960's technology.
- We would experience inconvenience and social severance by the construction of the proposed Eastern Distributor.

1010. HAYNES Alison

- Already, crossing South Dowling Street through a seemingly endless stream of traffic is difficult and hazardous. Residents attempting it include mothers like myself pushing strollers, family groups, elderly people and cyclists. Converting South Dowling Street into an eight lane freeway (10 lanes in some places) will made access to Moore Park virtually impossible for residents.
- The project will cut off resident of Surry Hills and Redfern from Moore Park and Centennial Park. There is a lack of open space in the area where we live. Access to these areas provides the only opportunity for many residents to enjoy recreation in a park.
- Traffic avoiding the tollway will be diverted into the local streets where our children play.
- This project will bring more cars to the city, hence increase air pollution.
- Eight lane freeway have no place in the inner city. If this ill-conceived proposal must proceed, the distributor must be built underground, emerging by the Supa Centa in Southern Cross Drive.

1011. McKENZIE Ewen

- Wants noise wall to be incorporated between the local area road and the through lanes between Todman Avenue and Link Road.
- Request that works required along this stretch be commenced at the start of the construction timetable to eliminate increased traffic and noise impacts at the earliest opportunity.
- Concerned about recent paper reports about the lack of support from Randwick Council
- Tunnel should be extended under South Dowling Street.
- Wants traffic access from Southern Cross Drive directly onto Foreshore Drive. This will have an impact in removing truck movements from the Botany area.

1012. DRAKE C

From type E

1013. PILFREY Michelle

- It would make life difficult as a pedestrian to get around the northern end of Woolloomooloo.

- Car exhaust fumes settle on window sill. As traffic increases this pollution will get worse.
- Wants tunnel extended from Domain through to William Street.
- The proposal is a visual impact on the community.

1014. COCKLE Garry

- Opposed to the 8-10 lane freeway on South Dowling Street.
- Concerned that the proposal will isolate locals from using Moore Park.
- Concerned about the increase in air and noise pollution.
- Visual impact will be enormous on the residents in the area and to the people of Sydney.
- Concerned that the proposal will create new problems and will not solve the old. Increase in traffic is a concern.

1015. HUDSON Michael and Jenny DE MOLE

- Believes the proposal will increase loss of parking.
- The public and private money put into the Eastern Distributor would be better spent on public transport.
- Believes the proposal will increase air pollution.
- Believes the proposal will increase the problems of traffic noise.
- Believes the proposal will generate considerable extra traffic.
- Concerned about the health-damaging air pollution and personal stress caused by excess cars for residents who live in the residential area around Liverpool Street.
- Since the tunnel under the Harbour opened, the neighbourhood surrounding Liverpool Street has been inundated with extra traffic. Liverpool Street has now turned into what seems to be an arterial road. Concerned about the current level of noise and air quality around Liverpool Street and are concerned that the Eastern Distributor will exacerbate these problems.
- Believes the proposal will reduce residential amenity.

1016. GMITROVIC Igor

- Aesthetically, the proposal is ugly and will ruin the look of the area.
- The only objection to this option is the higher cost of the tunnel when compared to the W3 option. This objection loses its strength when we consider that the ED is a commercial project and will be tolled.
- As the public is paying for it, it could well be done according to the public wishes.
- Agrees with option W5, proposing the extension of the tunnel from William St to the Harbour Tunnel entrance/Macquarie Street. This option would have all the environmental benefits, adding to the environmentally friendly image of Sydney. It would open new space allowing uninterrupted parkland between the Domain and the Botanic Gardens.
- It would also be a first stage of the proposed burying the Cahill Expressway underground from the SHB to Woolloomooloo.
- He wants the RTA to consider what happened to similar constructions in Los Angeles (USA) and Kobe (Japan), when they collapsed during the recent earthquakes. Although Sydney is not in the earthquake active zone like the above two cities, an enclosed (shell) structure such as a tunnel would be safer in case an earthquake ever strikes.
- The predicted traffic density stated in the EIS is largely arbitrary, and its level is likely to reach a higher value sooner than projected.
- The prospect of keeping noise pollution and air quality levels in the Woolloomooloo area under the specified limits are 'cloudy' according to the EIS.
- Concerned that the signal controlled right turn movement for southbound traffic at the Link Road intersection will be closed thus denying direct access to many businesses in the adjoining road network. Similarly concerned about the right turn access out of Link Road to continue southbound will be denied.
- He feels the Eastern Distributor option W3 will not provide potential for improved environmental amenity for residents in the areas above the tunnel.
- He feels the Eastern Distributor option W3 will not create opportunities to improve the quality of life for residents, workers and visitors to the eastern area of Sydney.
- Eastern Distributor option W3 will not develop an affordable proposal in an environmentally and socially acceptable manner.

1017. GRYGIEL Mr and Mrs CA

- It is recommended that the Motorway be placed underground from William Street to the Art Gallery bridge.
- That east/west traffic also be accommodated for under William Street.

- That Woolloomooloo is not severed from The Domain and the City and that the surface amenities are preserved, eliminating ugly and unuseable bridges.
- The proposed pedestrian bridge for Woolloomooloo is unacceptable. The issues not satisfactorily addressed include: visually degrading, hazardous to the elderly, safety, potential shelters for the homeless etc.
- Future developments not considered by the RTA in their project will have an added effect of preventing natural ventilation in the Sydney area. This in combination with higher volumes of traffic will adversely affect the health of residents, not to mention the nations greenest areas including, The Harbour, The Domain, The Botanic Gardens, and the Art Gallery of NSW.
- The EIS does not satisfy the stated principle of "Economic Sustainable Development" due to noise pollution, air quality, loss of amenity, visual degradation, quality of life, inadequate coverage of impact during construction. Nowhere in the whole project is any location affected to same extent as the residents of Woolloomooloo. The EIS has taken a narrow point of view with no consideration given to any other projects in the area, nor has it considered the environmental, social or historic issues in the area.

1018. JAGELMAN Ken

- The ED should be tunnelled to the Supa Centa centre.
- The toll booth should be positioned further away from the Art Gallery
- South Dowling Street is a beautiful heritage boulevard and should not be destroyed.
- Moore Park should not be reduced in any way.
- Toll avoiders will come up Baptist St and increase local traffic rather than reduce it.
- The Waterloo incinerator has just been closed down, this new proposal will cause more pollution in Baptist Street.

1019. WOLIFSON A and J

- An important feature of this proposal was the need to be completed before the Sydney Olympics. This deadline creates a clear impression that the proposal will proceed much as is. Obviously, time spent on considering designing or building a different but better proposal can be rejected on this basis alone.
- The community access centre was located well away from those areas worst affected by the proposal.

- Modify the plan to extend the tunnel at both the north and south so that residential and public areas along South Dowling Street and at Woolloomooloo will be less adversely affected.
- Believes that public transport options have not been adequately considered. Currently there is virtually no public transport between south-east Sydney and the Northern suburbs. The Distributor is not going to help our public transport system.
- The proposal will cause a serious degradation to the adjacent areas through unacceptable levels of noise. The EIS quotes the EPA's noise goal that the TNL should not exceed 55. It states that the RTA accepts this should be the long term goal. It then states the RTA's Interim Objectives as quoted in table 10.14 which are totally inconsistent with the EPA's stance. They do not place any limit on the noise levels. They simply state what bits the increase should be divided into. This is in direct contravention of the " EIS Practice Guideline - Roads and Related facilities " table 3 which states explicitly that the contribution to existing cumulative problems including noise and air should be considered.

1020. McCALLUM C and M PIRAMO

- Access to Moore Park is gained along the entire length of South Dowling Street, and formal access is gained via the signalised crossing near Parkham Street. Closure of these routes will significantly impede access to Moore Park for a great many of the park users. They are dismayed that there is no provision of pedestrian overpasses in the proposal to replace this access.
- Concerned that through traffic avoiding initially the construction activities and then the toll will significantly impact the residents of Bourke Street between Oxford and Cleveland Streets.
- The RTA has a statutory responsibility to adequately consider all options in order to minimise the environmental impact of any proposal. Option SDS6 is clearly the preferred option for the community of Eastern Sydney and has not received adequate treatment in the EIS.
- No commitment is provided in the EIS for the development of Local Area Traffic Management Schemes. LATM schemes must be funded and developed before any decision to approve the Eastern Distributor is made.
- The Eastern Distributor in its current form will significantly increase traffic and noise on local streets.
- The Distributor will create a visual and physical barrier separating the local community from parkland.

1021. PARR Helen

- The tunnel should be extended to Todman Avenue.

1022. SMITH Michael J

- The Eastern Distributor will cause a huge increase in traffic especially in Todman Avenue.
- The Eastern Distributor will cause a huge increase in air pollution.
- The Eastern Distributor will cause a huge increase in noise pollution.

1023. ASCOIGNE Fran

- Getting out of Surry Hills is a nightmare no matter in which direction one wishes to go. Thus with the Eastern Distributor if there is no improvement in east/west traffic the same problems will still exist.
- The residents of the ten lane strip will be put under more pressure of noise pollution.
- There will be such restricted access for all users of the stadia which could mean that the local residents will lose their parking on local streets during events.
- Ten lanes will mean annexing Moore Park to roadway. In a densely populated area the lose of any green space is a crime.
- The tunnel should be extended from Drivers Triangle to Link Road.
- Access for pedestrians to Centennial Park will be difficult and dangerous due to the Eastern Distributor.

1024. SANDERS M H

- Concerned about traffic on local streets especially on Riley Street.

1025. SPATCHURST Leigh and John

- The tunnel should be extended from Drivers Triangle to Link Road.
- Due to the addition of a toll a study evaluating the negative effects of toll avoiders on local streets and through traffic (particularly that created by sporting events and the proposed Showground development, before approval is given to the Distributor.

1026. ILLIGER Karen

- Asks the question "Is there going to be easy pedestrian access from Surry Hills to the Showground, Moore Park and Centennial Park".
- Asks the question "When the Distributor is opened, will the pollution be monitored daily, and more importantly, will anybody do anything about it".

1027. TURANO Chris

- The following should be strongly considered the creation of a boulevard of only four traffic lanes along William Street, harmonising the landscape with the adjacent Stanley Street/Little Italy precinct.
- The following should be strongly considered tree planting and paving along sections of William, South Dowling, Bourke, Flinders and Crown Streets to beautify these densely developed areas.
- The following should be strongly considered the extension of the Eastern Distributor to Link Road, Rosebery with appropriate exits to the Eastern Suburbs.
- The following should be strongly considered the simultaneous construction of an east west tunnel beneath the city centre, from the Sussex Street area to New South Head Road. Connections to the Eastern Distributor are vital.

1028. SERAFIM

- Objects to the proposed closure of Bourke Street at Gilligans Island between Oxford and Campbell Street and question the need to block off Bourke Street at the Forbes Street intersection. Provisions need to be made to allow local traffic to move about the area.

1029. BRESSAN Jan and Robert

- Urgently develop appropriate Local Area Traffic Management schemes before finalising approval for the Eastern Distributor which would prevent through traffic and toll avoiders using local residential streets.
- Provide for underground tunnelled connections to properly cater for East-West traffic, in particular, to have two ways free flowing traffic between Moore Park Road and South Dowling Street and Moore Park Road and Fitzroy Street.
- The tunnel should be extended from Drivers Triangle to Link Road.
- Shift the tunnel entry and exit portals in Moore Park Road to due east of Driver Avenue to reduce congestion around Driver Avenue/Moore Park Road/Anzac Parade/Greens Road.

1030. ILLEGIBLE Colleen and Graham

- States noise barriers would be more affective in reducing impacts to the residents rather than special road surfaces which might be used to reduce the noise.

1031. JORDAN Keith

- If there must be a link between the harbour crossing and the Southern Cross expressway, then it should be a 2 lane tunnel in both directions, one above the other, from the Royal Botanic Gardens to O'Dea Avenue.

1032. LALOR Mark, and Terry O'NEILL, David HANK

- The affect of the current proposal on residents of Kidmans Terrace would be unbearable noise levels Table 10 - 15 page 10 - 85 of the EIS shows a 10 - 14 dB(A) noise increase. There appears to be no noise mitigation plan for Kidmans Terrace.
- Particular concerns during construction are 24 hour construction, 24 hour truck movements, vibration during tunnelling, dust emissions and pollution.
- The affect of the current proposal on residents of Kidmans terrace would be risk of damage to heritage residences by heavy and dangerous goods vehicles using the off ramps to and from William Street (Table 5.4 page 5 - 11).
- The affect of the current proposal on residents of Kidmans Terrace would be a decrease in parking during construction and by the proposed pedestrian walkway over Cathedral Street.
- The motorway should be tunnelled from William Street to the Cahill Expressway as proposed by Sydney City Council.
- That toll plazas be located underground to minimise visual impact and electronic tolling is implemented.

1033. TOMLIN David

- As a resident of Surry Hills he feels alienated from Moore Park and will find access for his family to Centennial Park for bike riding considerably more dangerous.

1034. RICHARDSON Charlie (Central Sydney Community Transport Group Inc)

- The time allowed to make a response to the EIS is an abuse of the process.

- The Eastern Suburbs, the CBD and the Central Industrial Area are a magnet for people looking for work. The Eastern Suburbs also has entertainment and medical facilities. People in the western suburbs should not be encouraged to drive to find these facilities. Ideally, they should be located in the west. The Distributor would undermine the economic viability of the establishment of such facilities closer to the homes of people in the west by undermining the patronage potential.
- Agrees with chapter 5.1.1 conclusions but these objectives should be achieved with excellent public transport links, movement of heavy freight by rail, and the introduction of policies to discourage the growth in car travel. By increasing capacity for cars and trucks it will guarantee more of them come into the area.
- Section 5.2.2 of the EIS. "Vehicle trip generation influences, including the relative cost of travel by competing modes and the effectiveness of public transport and non-motorised travel initiatives" and "Policy issues associated with pricing, traffic management and traffic demand management". It would be responsible to use these variables to reduce demand rather than inducing traffic by the construction of extra road capacity.
- People living in western Sydney who come to the area of the Eastern Distributor by public transport will drive because of the proposed Sydney Orbital. Public transport facilities should be improved in preference to driving.
- There is too much emphasis on road transport rather than investment in public transport (quotes from Richard Botswood and Professor Pharoah). Motorways do not solve traffic chaos.
- Chapter 5.1.3 states that the area to the east will not be served by rail. This is now redundant as a plan was announced in December to extend the heavy rail line from Bondi Junction to Bondi and has gained interest in further extension to Darlinghurst, Charing Cross, Randwick, the University of NSW, Coogee and Kingsford. The Distributor has the potential to undermine the patronage potential and hence the viability of this responsible transport proposal. It has the potential to do the same to the existing eastern suburbs railway line. the temporary reduction in Harbour Tunnel-induced congestion in the area is likely to reduce congestion (temporarily) in east west traffic. Some people would abandon rail travel for car journeys. This will bring back congestion.
- In combination with the M5 east there is a threat to patronage of the East Hills Rail Line. The NSR is designed to relieve rail congestion between Sydenham and the CBD, thereby enhancing the operation of the East Hills line but this could be undermined by the two road proposals
- It defies logic that if the Distributor were built that it would remove traffic from local streets. The Distributor would be a segment of a ring road into the western suburbs. It would give drivers from the west easier and quicker access to the streets in the vicinity of the Distributor.

- Any company in the business of tollroads would want to increase traffic levels. Asks if the operator of the Distributor will have a performance contract for traffic volumes, similar to the one between Transurban City Link and Translink.
- Quotes E.M Farrelly and Professor Tim Pharoah "Increasing road capacity does not solve traffic problems but leads to increased traffic levels".
- WP Section 3.2.7. Describes the concern about induced traffic as "a view held by many individuals", which gives the impression that no authority or government agency has taken the question seriously. This is belied by the SACTRA report.
- The SACTRA report referred to is misleading. The EIS states in section 3.2.7 "within the context of existing appraisal procedures for trunk road projects in the United Kingdom which, while having a number of similarities with Australian practice, is highly systematised and some areas are very different from local procedures". Asks whether this statement attempts to imply that the UK traffic modelling procedures are inferior to those used in Australia, or that they do not apply to Australian conditions? If so, why not say it outright and spell out the grounds for saying so, thereby allowing discussion to take place on this issues.
- WP3 Section 3.2.7 misrepresents SACTRA. Submission highlights the text from the Working Paper which summarises the SACTRA conclusions. The RTA's summaries are compared to the actual text from the SACTRA report to demonstrate the alleged misrepresentation. The phenomenon of induced traffic does exist. The SACTRA report painstakingly and scientifically confirms it to the extent that the British Government accepted the main findings of the report and cut its road budget by half and has undertaken other actions detailed in the submission.
- Discussion of induced traffic appears in the Working Paper but not in the main report. This could be interpreted as an attempt to hide it. The misrepresentation of the findings of the SACTRA report could be seen as an attempt by the RTA to mislead the Department of Urban Affairs and Planning.
- Community consultation seems to be window dressing for a predetermined decision. The people of Sydney are entitled to a fair and open assessment of the impact of the Eastern Distributor.
- RTA officers at community consultation have falsely stated that the purpose of the consultations is to allow residents the opportunity to request modifications to the proposal which might mitigate its negative effects. This misleads people into thinking this was not a process, the outcome of which can include non-approval, thus limiting the responses which people make.
- The total cost of the EIS was \$130.00.
- The time given to respond to the EIS was only four weeks, extended to just over five weeks. What chance does the public have to comment meaningfully in such a short space of time? The document is huge and puts it out of the reach of much of the population in

the area. To comment on the EIS requires a longer time frame, only a few of the issues raised in the EIS were able to be addressed. With more time it could be further demonstrated that the EIS is inadequate and misleading.

- The process is deserving of an inquiry. The EIS contains falsehoods, RTA officers have been evasive and misleading. There must be assurance that the process is genuine and not supporting a decision already made.
- The EIS was speedily produced, huge in size and superficial. The process in which it was produced was more a sales drive rather than a proper and neutral discussion of the issues.
- The Minister for Planning described the EIS for the second airport as taking a matter of months which took more than two years to complete last time. The Eastern Distributor EIS has been undertaken by the same company and the same criticism could apply to the Eastern Distributor's EIS.
- The EIS has reached a new low in integrity. It is not a scientific neutral document but reads like a public relations literature or sales document.
- There are misrepresentations of SACTRA and Professor Hensher.
- The EIS is partial to the yes case. All positive effects are magnified or invented. Anything negative is made to appear doubtful or minimal. The language used is often misleading, such as exhaust shafts being described as ventilation shafts, which gives the impression that they are meant to deliver fresh air into the tunnels, rather than indicating their true purpose.
- At present the route out of Woolloomooloo is along Cathedral Street. The Eastern Distributor will discourage the use of this route. The proposed elevated crossing would require pedestrians to cross stairs or ramps and not all can manage this. If the bridge is not covered it will be exposed to the elements. If covered it will be exposed to muggers. Fit people loathe using the Butlers Stairs due to the likelihood of assault.
- Woolloomooloo has a Department of Housing Estate, high number of public tenants, half the families have incomes less than \$15,000, 43% of people over 60 live alone, half the households do not own a car and there is low use of private vehicles by state average. This means there is greater access needed for public transport and other facilities. Access barriers already exist for Woolloomooloo due to geography and other developments. If the Eastern Distributor proceeds it would be unfair that Woolloomooloo would be exposed to disruption, noise, fumes and general nuisance of a motorway. Woolloomooloo needs better public transport and local facilities.
- It would be unreasonable if Surry Hills is exposed to the disruption, noise, fumes and general nuisance of a motorway as the local population owns few cars, has a high proportion of elderly residents, access is difficult for people with less mobility, has public housing and a high rate of public transport use. Public transport should be improved.

- There is a "traffic risk" to investors in motorways due to oil shortages overcoming the effects of induced traffic within ten years.
- Reports of "World resources 1996-1997 - Petroleum Resources: When will production peak?" and "The World Oil Supply 1930-2050" are cited (copies available of these reports and several others attached). The prediction is that global oil production will peak around the turn of the century. These predictions must be taken seriously because it is based on the world's largest database on world oil supply. After this, the world supply of oil will halve every 25 years. This means that traffic projections made which do not take account of this possibility are not based on reality.
- In the EIS, the question of future oil supplies is considered in section 5.2.5. The following comments are provided on this section:
 - ⇒ The title of Petroconsultants' report is wrong and should be "The World's Oil Supply 1930-2050".
 - ⇒ Professor Hensher's "Socially and Environmentally Appropriate Future for Motor Car" does not oppose the view promoted by the Petroconsultants' report. His work does not attempt to quantify future oil supplies but gives statistics on consumption of oil. The misrepresentation of Professor Hensher's work could be seen as sloppy work of the consultants or that it is a deliberate attempt to mislead the Minister.
 - ⇒ The traffic forecasts give no attention to declining fuel supplies.
 - ⇒ The EIS states that "There is a finite known supply of petrol and other fossil fuels" is true but the statement "When present consumption levels are applied to known fuel supplies, a simple trend analysis can show when current supplies will be depleted." is absurd. A trend analysis can not show when current supplies will be depleted. A detailed explanation of oil depletion is included in the submission based on the reserve/production ratio to refute the EIS statement.
 - ⇒ Quotes from the EIS that "On the other hand, if the known pool of available supply is expanded, or it is used more efficiently or limited fossil fuels are replaced with less limited or renewable fuels, the constraint of petrol supply on travel behaviour is reduced". The prospect of finding new cheap oil anywhere is very limited (details in the submission why this is so). We are in a high risk period where transport policies will have a large influence on the outcome of future oil supply.
 - ⇒ The Government may have sought to reduce dependency on private vehicles but with what success? Besides the misleadingly mentioned quote from Professor Hensher's paper, what evidence is there of an expanded market role of alternatives to fossil fuels in transport?
 - ⇒ Due to oil shortage, price of goods will rise which will lead to a decline in economic activity and result in less demand for transport. The notion that people would continue to use the Eastern Distributor because "travel efficiency will become more valued by travellers" in an oil shortage regime is nonsense. Why would people who are

economically strapped due to an oil shortage (reducing their purchasing power) pay to use a tollroad when they can use a far less congested public road for free?. The EIS statement that people would continue to use the toll road because "the proposal supports improvement to public transport and other alternatives to private travel" is nonsense. With lack of congestion due to oil shortage, public transport would be utilised without the Eastern Distributor. "Alternatively, fuelled vehicles would be able to use the facility" but there are not alternative fuels available for the present scale of transport use.

⇒ Section 5.2.5 concludes "that the debate has not produced definitive findings and there is insufficient evidence available to suggest abandonment of the desired road corridors is an appropriate response to the issues." The debate has not produced definitive findings because the upstream oil industry refuses to discuss the specifics raised.

- It is extremely unlikely that we will be able to import oil at \$20 per barrel as hypothesised, after the year 2000. Road schemes such as the Eastern Distributor must be abandoned. Government must discourage growth in kilometres travelled. A traffic reduction program is required in order to conserve oil. Otherwise a heavy price will be paid in unemployment, social dislocation and business bankruptcy. Government must price petrol through levies in urban areas and direct this to public transport. Land use must be altered so that people work closer to where they live. Explore alternative fuels.
- The concluding paragraphs of "Petroleum Resources: When will Production Peak?" is quoted. The implications for the justification and viability of the Eastern Distributor are undeniable.
- The rail link between the CBD and the Airport will be undermined by the Distributor. This would also affect the urban consolidation initiatives in South Sydney.
- The figures quoted in 5.1.3 on the NSR would become invalid if the proposal to build the Eastern Distributor were to be approved. The proponents of the NSR would not have taken into account the effect of the Eastern Distributor because it was not a current proposal. The manner of the presentation of the figures could be deceptive. One could conclude that the railway would, in the absence of the Eastern Distributor, attract few people out of their cars for a journey to the airport. The figures appear, at first sight, to suggest that more people would abandon bus transport for the train than would abandon car travel. This is because the figures were expressed as percentages. More people travel by car than by public transport, so a small percentage of car travellers can be more people than a large percentage of people who would otherwise travel by bus. The effect is that it appears that competition from the Eastern Distributor would undermine the ability of the NSR to attract people out of their cars a little, whereas it may undermine it a great deal.
- The EIS quotes superseded figures in relation to Sydney Airport (5.2.1) for mode split of people travelling to and from the airport. These 1994 figures were compiled before the Eastern Distributor was mooted. By increasing road capacity with the Eastern Distributor, the figures quoted in the section of the Airport are almost guaranteed to be exceeded. Road congestion itself is a disincentive for non-essential car travel. If a decision is taken to not proceed with construction of the Eastern Distributor, the congestion will encourage

people to use the NSR or buses travelling on bus priority lanes and using either bus priority measures, if these were implemented instead.

- This is the first high profile road that the RTA is not the consent authority. Considers that DUAP have the opportunity to approach the proposal with a more open mind. The Minister for Urban Affairs and Planning stated that the EIS produced for the second airport was "quick and dirty". This is the same company that did the EIS for the Distributor.
- Section 3.2.7 of the traffic and transport working paper concludes that "tolling of roads will suppress demand and counteract induction of trips which may result of the Eastern Distributor". The tolling of roads may suppress demand to some extent on the tolled road itself but there is concern that it will stimulate demand for car travel in the area in general. If the Eastern Distributor does proceed and does attract traffic away from roads, other traffic will fill this vacuum. Overall level of traffic would increase.
- Section 8.1.2 in the working paper regarding influence of toll is in conflict with section 3.2.7. 8.1.2 states that cars may choose alternative routes but that changes would be unlikely to be high enough to result in significant changes to local amenity. It seems that the EIS believes the effect of the toll is major when this can be used as an argument for the Eastern Distributor and minor when it can be used as an argument against the Eastern Distributor. Two such opposing views can not be promoted in the same paper without arousing deep suspicion within the community.

**1035. HOPKINSON Simon, Louise DELACOUR, Stephen PRODES
and Louise BICKLE (SSCC Precinct 15 Public Forum Working Group)**

- Supports right turns between Greens and Moore Park Roads being prohibited as proposed by the Eastern Distributor EIS. If Greens Road only has to carry light volumes of through traffic, all design and cost problems shrink while design and amenity benefits grow. Submission includes reference to the draft LATM proposal for greening Greens Road and lists the benefits and costs if the right turns between Greens and Moore Park Roads are prohibited.

1036. PAXINOS George (Light Rail Association)

- There would be few people that would argue that this section of the expressway is not needed. But the current congestion in the area affected by the proposal is a brake on the increase in traffic along the corridor. If the brake were completely removed, traffic volumes could be expected to increase significantly as predicted in the EIS.
- Although the EIS purports to having considered street based public transport, it has hardly been considered in the EIS. Apart from a few localised intersections where cross-bus traffic may enjoy the benefits of reduced delays at intersections, there have been few opportunities identified for any improvements of public transport. This is summed up on page 5-51 where "the authorities are expected to explore a more intensive range of uses in

the longer term". "Only minor changes will be made to existing bus routes in the short term". Considering the project has been on agenda for nearly 50 years, it would not be unreasonable to expect a more definitive program of public transport improvements than has been given. It must be concluded that few, if any, benefits will accrue to public transport.

- The greatest omission in the EIS is its complete failure to address the total transport movements in the corridor that will ultimately extend from Gore Hill down to Sutherland. The corridor is served by the Illawarra railway line but a transfer is required in the city for passengers travelling to the North Shore. This is a heavily trafficked railway corridor with some 15,000 passengers per hour carried past Sydenham and 12,000 per hour on the Sydney Harbour Bridge. Significant road corridor improvements would have the potential to take passengers away from this train system. This happened when the Captain Cook Bridge was opened where some passenger levels fell by 20%. The Harbour Bridge Tunnel had an effect on train passenger usage on the lower North Shore and ferries as well. Some bus services benefited due to the Gore Hill Freeway.
- There is no reference in the EIS to the potential for the Easter Distributor to attract people away from the North Shore/Illawarra line and what effect it would have on the congestion level on the Distributor and roads in the area. There is no mention of reduced patronage impacting on the finances of the Illawarra and North Shore railways.
- There is no reference to the potential loss of passengers from bus services in the south/eastern suburbs, particularly those passengers that transfer in the City for destinations on the north side. These will be vulnerable to the new road access which will provide a wide range of improved motoring opportunities while improvements in public transport will be negligible and might even be negative.
- It is surprising that the EIS does not discuss the potential for light rail in the south/eastern suburbs. This is a densely populated area and contains many kilometres of former tramway reservations. Together with the St James tunnel system, light rail has potential to provide an alternative to motoring at low cost. The construction of the Distributor raises the prospect of extending the existing Anzac Parade public transport corridor along Flinders Street to Taylor Square and on to College Street and Wentworth Avenue. There would be sufficient room in Flinders Street to implement a transport corridor in the centre with loading platforms at stopping places. In between the loading platforms the corridor should be lined with an avenue of trees which would extend the greenery of Moore Park area through to Taylor Square and onto Hyde Park. The "green link" would enhance the urban design of the area.
- The removal of cross traffic from Oxford Street, between Taylor Square and College Street, and the additional green time available to traffic in Oxford Street could permit the provision of the extension of the public transport corridor down to College Street. This is a short distance from the southern fly over of the St James tunnel system which, when connected to the Oxford Street corridor, would enable a protected right of way for public transport from City underground right out to the south/eastern suburbs. It would be appropriate to upgrade this corridor at major intersections such as Cleveland Street and Dacey Avenue, so that the public transport could be grade separated from cross traffic at these two intersections. At the northern end of Anzac Parade corridor reservation

currently used by buses could be extended across Moore Park Road and into the centre of Flinders Street.

- Major road projects such as the Eastern Distributor without comparable improvement in public transport will shift movement to private transport. On page 5-45 it is stated that "Government policy has sought to reduce dependency on private vehicles and provide alternative transport forms for commuters and businesses." This is certainly not the case for the Eastern Distributor.
- Consideration should be given to downgrading the capacity of the Eastern Distributor to two lanes in each direction with a simultaneous development of a light facility from the south/eastern suburbs to the St James Tunnel system. The Anzac Parade bus road should be retained for present use, grade separated at Cleveland Street and Dacey Avenue, and all services channelled on to them. This corridor should be extended in the middle of the road down Flinders Street and Oxford Street before joining normal operations in Liverpool Street. A two lane expressway in each direction would provide a satisfactory level of service for at least 20 hours a day and for most of the weekend at much less cost than three lanes in each direction, with far less impact on open space in Moore Park and on the residential amenity of Woolloomooloo.
- The downgrading of the expressway would be in keeping with current access to the north and to the south, and would prevent a major transfer of peak hour commuters from rail to road.
- The upgrading of the south/eastern suburbs public transport services from bus to light rail would make a tremendous difference to service levels from those suburbs and would have the benefit of removing buses from city streets and Circular Quay.
- An alternative to driving along the Eastern Distributor corridor would be the introduction of rail in the corridor south from Kingsford to the Airport and then through Kogarah and Rockdale to Sutherland Shire. The existence of the goods railway line and the freeway reservation from Cooks River Goods Yard to Miranda would provide a corridor for the development of a high speed light rail service. This would serve Miranda Fair, Airport, Eastgardens, University of NSW and Moore Park venues. This has the potential to extend to North Sydney and North Shore by using former tramway tracks on the Sydney Harbour Bridge. St James tunnel system could be connected to Wynyard. This could be less costly than the Distributor. It could connect The Spit to the Warringah Peninsula and along the Epping Highway.
- The light rail corridor at Randwick could be witted away as proposed in the EIS. The Government should act to develop a regional public transport plan and protect light rail corridors.
- Light rail is preferred to other types of public transport is due to its ability to use corridors, surface tunnels and existing tunnels without major acquisition. Light rail can be a more frequent service. The southern suburbs railway will cost \$700 million, whereas light rail between the city and south/eastern suburbs, serving the same number of passengers could be constructed for a quarter of the cost. There is greater number of stopping places with

greater chance of attracting passengers. People do not generally like travelling in buses and find light rail more attractive.

- Despite major upgrading of Dowling Street, no regular bus services use this road. On the other hand, Anzac Parade is one of the busiest line haul bus routes in Sydney with major traffic delays at numerous cross streets, yet there are no proposals to eliminate these. On page S-vi of the EIS it is conceded that the performance of some intersections may decline after the Eastern Distributor is opened. This could have detrimental effects on bus services.
- There is some reference to the effects of the new southern railway but this is likely to have much effect on bus services. The stations are too close to the city for significant time savings to be made from transferring between bus and train services. The level of integration with buses and trains still compete for passengers without transfer tickets, without coordination of timetables and inadequate interchange facilities. It is significant that the Bondi bus route, which has enjoyed a 15% increase in patronage according to the EIS, runs at least twice as frequently between the city and Bondi Junction. There is no reason to believe that integration of bus and rail services on the new airport railway will be any better than it has been in other parts of Sydney.
- The major traffic bottleneck will be moved to Millpond Road, Botany Road and General Holmes Drive. Any shift in patronage from rail to road along the corridor between the Airport and Sutherland Shire will have a detrimental impact on General Holmes Drive and all of the major arterials that traverse the Kogarah/Rockdale area.

1037. GAN Peter

- Agrees with the City Councils proposal for a tunnel at Sir John Young Crescent. More important to extend the Cahill tunnel across The Domain. Entry ramps although undesirable, can still be provided to link with Macquarie Street.
- The overpass at Sir John Young Crescent intersection will totally alienate Woolloomooloo from The Domain and vice versa. There will be no pedestrian access.
- Objection to the tunnel air vents.
- Rather than collect the exhaust into a few chimneys it is far better to let it out through many points along the centre of local roads above the tunnel. The vents will appear to be grilles in the road surface.
- The William Street intersection with the two storey tunnel well below ground level still uses too much land even if it is owned by the RTA. More attention needs to be paid to the local environment and to the revenue from the sale or lease of the land and air rights once the road works are complete.
- As there is currently no southbound access to the existing underpass at William Street the proposal for access at William Street should be reviewed. The toll is to be applied only to the northbound lanes so the provision of southbound access provides no revenue unless electronic tolls are introduced. Provision of access will attract traffic to William Street that currently finds another way to its destination.
- Clearly, the analysis of the options has been carried out on too narrow basis. The cost/benefit analysis has focused too closely on direct costs. The City Council taking upon itself the burden of commissioning an analysis of tunnel options demonstrates the RTA's unfitness to manage the project.
- The process of assessment needs to change. Brochures advertising the Environmental Impact Statement show the Chief Executive of the RTA making all the key determinations except for approval or disapproval of the project by the Minister for Urban Affairs and Planning. In these circumstances it is inappropriate for the Chief Executive to be making determinations in regard to the Eastern Distributor. The determinations should be made by the Minister for roads as he is repressible for the RTA.
- Manual and machine methods of toll collecting are very inefficient, requiring huge capital investment and ongoing labour costs. The toll collection points are severely restricted by land requirements and the need to stop all vehicles where a toll is collected. There are significant cost and environmental savings to be made by abolishing the existing toll gates on the Harbour Bridge, M4, M5 and not completing them on the M2.
- The key to some of the environmental problems created by the Eastern Distributor is the reliance on outdated toll collection technology. The location of the toll gates and their impact on route selection (toll avoidance) by drivers is a significant environmental issue.

- From a revenue perspective tolls should be collected for the portion of the toll road travelled by every vehicle. The Government deems should pay the toll, with the toll being related to the vehicles size. Savings from not using conventional collection methods can then be shared with the drivers. This would be an incentive for drivers to have the appropriate devices fitted to their vehicle. A surcharge could be applied to drivers who don't fit the devices which could be collected at the time of vehicle registration.
- Electric tolling systems give the Government enormous flexibility in crafting transport policies by allowing almost any journey to be tolled.
- The RTA is already using a form of electric toll to monitor the average traffic speeds along major roads. As there is still a few years before the completion of the City-Link Project and the Eastern Distributor, a common toll system could be developed for Australia. Vehicle manufacturers could install these devices at the time of manufacture. This system should inform the drivers, via a in car, screen of the toll being collected. This system could then be used on other roads for revenue raising or to discourage their use.
- The proposals for Sir John Young Crescent intersection is an environmental disaster.
- The cost/benefit analysis should consider the long term impact on Woolloomooloo. The project is an opportunity to dramatically improve the environment of Woolloomooloo. As the first suburb east of the city, with a major park on one side, the Harbour on another, its proximity to the CBD, the restaurants of East Sydney and the rich cultural environment in the surrounding suburbs, Woolloomooloo could be the most sought after residential suburb in Sydney if its not torn apart by road construction.
- Sensitive rather than brutal road construction will bring direct revenue gains to the government in the form of land tax and pay roll tax that will far outweigh the cost of putting the road in a tunnel. The indirect revenue gains to the government from increased tourism and other activities will be significant as well. The long term impact on just the Finger Wharf is probably sufficient to justify an underpass at Sir John Young Crescent.

1038. ROBINSON Ian (NSW Department of Transport)

- Four major bus corridors servicing the city are affected by the proposal (Anzac Parade, William, Oxford and Cleveland Streets). All Anzac Parade bus routes are directly affected by the proposed road and bus routes using William, Cleveland and Oxford Streets. These bus routes are likely to be adversely affected by regional traffic flow changes if priority measures are not implemented.
- On page 10-34, Chapter 10, the Environmental Impact Statement simply states that "the overall percentage of forecasted travel on the New Southern Railway that may choose to travel along the improved Eastern Distributor corridor would be likely to be small and would not affect the viability of that public transport initiative".

- No assessment of mode shift has been made by the Environmental Impact Statement. The Environmental Impact Statement does not foreshadow any impact that the Eastern Distributor may have on the New Southern Railway.
- Bus priority measures need to be implemented in the section of Oxford Street between Flinders and Elizabeth Streets. The priority measures are required for 24 hours, due to the level of traffic congestion which occurs in this section during business hours, evenings and on weekends. Buses deliver 310,000 passengers per week through Oxford Street and the bus priority measures will ensure that maximum benefits are achieved along this corridor.
- The section of Oxford Street between Flinders Street and Lang Road should also be considered for similar treatment, as it is likely that traffic volumes will be reduced on this section, thereby providing scope for the introduction of bus priority measures. Some 79,000 bus passengers per week travel on this section of Oxford Street and 462 buses per day use this section.
- Full-time bus lanes should be introduced in Flinders Street (both sides) between Moore Park Road and Oxford Street. 60% of the inbound passengers in the morning peak in Flinders Street are on buses.
- While the Environmental Impact Statement states that bus priority measures will be investigated and agreed to by the Transport Task Force after the Eastern Distributor proposal is determined, this approach is considered flawed for the following reasons: it is not clear if the taskforce will have any authority or whether any funding will be available; and there is difficulty in implementing bus priority measures due to sectional community interests concerning parking and road capacity constraints.
- Sydney Buses is concerned that the Environmental Impact Statement has not assessed the full impacts of its services, and that these impacts will be significant and will lead to higher operating costs, loss of patronage and less revenue.
- Data supplied in the Environmental Impact Statement is inadequate to allow an informed judgement about regional traffic impacts.
- Insufficient information is contained in the Environmental Impact Statement to assess impacts on the regional road network.
- Sydney Buses run a number of bus services along Crown and Bourke Street between The Crescent, Campbell Street and Albion Street.
- The Environmental Impact Statement suggests that both roads should be returned to two-way flow, retaining a midblock capacity of one lane in each direction.
- The existing one-way arrangements should be retained for the following reasons: simplified phasing at the intersection with Cleveland Street; it allows parking to be retained on both sides of these streets right up to major intersections; it allows a full-time bus lane to be

allocated together with one single lane from traffic; and it enables footpath widening at bus stops and at intersections along each street.

- The retention of a single lane for general traffic together with narrowing at intersections along the roads will restrain traffic volumes using these routes, while ensuring that other objectives for public transport and local amenity are met.
- The proposed traffic management treatments at major intersections along these routes should be selected so that bus operations are not disadvantaged through inappropriate treatments or facilities.
- Sufficient funding should be provided to ensure the selection of appropriate facilities.
- It is essential that a package of bus priority measures, including a network of 24-hour bus lanes, be implemented in tandem with the construction of the Eastern Distributor, or preferably before its completion, in order to maintain the integrity of public transport in eastern Sydney.
- Bus lanes and bus priority at traffic signals (where appropriate) should be incorporated on the following streets: Flinders; Oxford; William; Albion; Fitzroy and Foveaux; Crown and Baptist; and Bourke Streets.
- The Environmental Impact Statement suggests a possible transit lane and peak hour bus lane in William Street, west of the Eastern Distributor.
- Bus lanes and priority measures are required in both directions in William Street for 18-24 hours per day. Peak hour bus lanes should be implemented in the first instance, together with bus priority measures at intersections.
- Priority measures should be implemented between Elizabeth Street in the City and extend to Double Bay.
- Bus priority in Cleveland Street at South Dowling Street should be retained at the intersection.
- Full-time bus lanes should be introduced in Flinders Street (both sides) between Moore Park Road and Oxford Street. 60% of the inbound passengers in the morning peak in Flinders Street are on buses.
- Bus priority measures need to be implemented in the section of Oxford Street between Flinders and Elizabeth Streets. The priority measures are required for 24 hours, due to the level of traffic congestion which occurs in this section during business hours, evenings and on weekends.
- The Eastern Distributor should allow the opportunity to introduce bus lanes (full time) in Albion and Foveaux Streets through capacity improvements at the major intersections.

- The Environmental Impact Statement reference to "public buses" being exempt from tolls is inappropriate. It is recommended that all regular bus route services, irrespective of ownership, be exempt from tolls. Services which use the Eastern Distributor should be provided with a dedicated lane (irrespective of tolling technique in use) through the toll plaza and approaches. The definition and associated measures should be discussed with the Department of Transport. It is noted that the Bus and Coach Association have separately sought clarification on this matter.
- The Environmental Impact Statement states that traffic volumes in Cleveland Street will remain similar to the existing volumes along the full length of Cleveland Street, with increases in some sections and reductions in other sections. Cleveland Street is congested throughout the day and evening over the full week.
- Sydney Buses currently run some 341 buses per day carrying an estimated 101,000 passengers per week in Cleveland Street.
- Bus priority measures need to be undertaken in Cleveland Street, including a transit lane. Bus operations are and will continue to be affected by intersection capacity and congestion at intersections along Cleveland Street. The provision of a transit lane in Cleveland Street will assist public transport and encourage a change in mode split.
- There is concern that the intersection of Cleveland Street and South Dowling Street will be a major constraint (due to capacity limitation) within a short period following the opening of the Eastern Distributor, particularly if the corridor attracts higher traffic volumes than anticipated.
- The loss of the right turn movements into and out of The Crescent at South Dowling Street could also be expected to increase turning movements at the Cleveland Street and South Dowling Street intersection.
- Bus priority in Cleveland Street at South Dowling Street should be retained at the intersection.
- A transit lane should be implemented between City Road and Anzac Parade.
- The STA provides an extensive and frequent bus service to the Eastern and South Eastern suburbs of Sydney. These services underpin the financial viability of STA and are experiencing substantial growth in passenger demand. Eastern services are currently experiencing a growth rate of 9% per annum. The Eastern Distributor provides a strategic opportunity to consolidate and increase this growth in patronage.
- The magnitude of the transport task undertaken by the STA, during morning peak time, is indicated by data presented in Table A of the submission. For example, almost 20% of all bus passengers entering the City during the morning peak period travel along the Anzac Parade corridor. It is estimated that some 60% of people along this corridor use buses during the morning peak time, yet buses account for only 8% of vehicles on the corridor. The corridor carries 209 bus trips during the morning peak.

- Sydney Buses carries (per year): 11.9 million passengers in Flinders Street; 6.8 million in Fitzroy Street; 16.1 million in Oxford Street; 4.1 million in William Street; and 5.2 million in Cleveland Street.
- Sydney Buses considers that its bus operations should be enhanced and not disadvantaged by the Eastern Distributor proposal, either during the construction period or after the Eastern Distributor is operational.
- Sydney Buses is concerned that the Environmental Impact Statement document has not assessed the full impacts on its services, and that these impacts will be significant and will lead to higher operating costs, loss of patronage and less revenue.
- The proposed construction arrangements in Anzac Parade are conservatively estimated to add \$1.8 million to Sydney Buses operating costs. The disruption to services in Cleveland Street over the three year construction period is estimated to add a further \$1.2 million to operating costs. The proposed re routing changes due to the closure of the median strip in South Dowling Street at The Crescent will add an extra \$400,000 in operating costs per year.
- Apart from the economic impacts to Sydney Buses, the wider implications are that the recent gains in achieving an efficient, equitable and ecologically sustainable transport system in the area will be lost, unless significant public transport initiatives are included in the proposal.
- Travel outside the traditional peak periods is substantial. Bus passenger demand in the eastern suburbs is strong throughout weekday business hours, weekends and at night. Major educational facilities, hospitals and retail and sporting facilities generate sustained demand. STA buses are commercially viable in eastern Sydney, the services are heavily patronised most of the time, and are used for many purposes apart from commuter needs.
- All STA bus services running to City terminals and originating in suburbs, extending from Watsons Bay around the coast to La Perouse, are potentially affected. A full list of routes and suburbs affected (by corridor) is included in Table B in the submission.
- The proposed road is likely to have profound implications for the efficient operation of surface public transport in the eastern and south eastern suburbs of Sydney. The implications will arise during the 36-month construction phase and in post construction. Regional traffic impacts will, in all probability, impact on bus services that are not proximate to the intended corridor.
- Bus services operating in heavy traffic on all corridors in Eastern Sydney are subject to extensive peak period delays. This delay impacts upon service reliability, patronage and revenue potential. As peak delays increase, a downward spiral occurs. As operation costs to STA increase, attractiveness to users diminishes and patronage and revenue decline.
- Delay impacts are not confined to peak periods. As bus services are well patronised outside of traditional peak hours, any delay will cause substantial losses irrespective of the time period.

- As a matter of principle, the freeing of road capacity should be accompanied by measures to enhance bus operations.
- The Eastern Distributor needs to be recognised as a transport proposal which incorporates public transport initiatives rather than just a road proposal, and that such initiatives should be implemented for the construction period as well as when the Eastern Distributor is operational.
- To properly assess the impacts on bus operation, travel time impacts in both peaks, business hours, at night and on weekends are required. The Environmental Impact Statement document only provides limited information on which to assess regional impacts. (Daily volumes on a few nearby streets.)
- Major road improvement projects such as this generally change travel patterns over a large area and can result in significant redistribution of trips, due to the increased road capacity. This will often place more pressure on the surface street system, at or near the entry and exit locations to the new road facility, as well as on other major roads in the area. Higher traffic volumes and levels of traffic congestion disadvantage public transport by undermining the reliability of service delivery through additional delay.
- Bus priority initiatives should be incorporated into the overall proposal. These initiatives should be determined as part of the Environmental Impact Statement process.
- Bus lanes and bus priority at traffic signals (where appropriate) should be incorporated on the following streets: Flinders; Oxford; William; Albion; Fitzroy and Foveaux; Crown and Baptist; and Bourke.
- There should be improvements to the bus corridor in the Anzac Parade corridor, which includes the retention of the bus roadway between Gregory Avenue and Moore Park Road, together with bus lanes to Kingsford along Anzac Parade and a transit lane in Alison Road.
- There should be improvements to the current bus transport servicing strategy and operation for the Sydney Football Stadium, the Sydney Cricket Ground and Showground areas.
- There should be bus priority measures in Chalmers and Elizabeth Streets (between Cleveland and Hunter Streets).
- A transit lane in Cleveland Street should be implemented.
- There should be the flexibility to introduce bus services and bus priority measures along South Dowling Street at a future date.
- Rail Access Corporation considers that the proposed roadway will directly compete with rail for travel from Western Sydney to the airport or areas in the east and north. There is also a potential impact upon patronage of the East Hills and North Shore lines due to

network linkages with other road infrastructure, such as the Harbour Tunnel and Gore Hill Freeway.

- The Eastern Distributor Bus Priority Taskforce has no funding commitment, no powers to ensure works are carried out and no proposed legislative or contractual responsibility. The Task Force does not appear to be in a position to ensure the continued viability of public transport in the area affected by the Eastern Distributor.
- The construction and operation of the proposed Eastern Distributor will have significant impacts on the viability, attractiveness and operations of bus services in eastern Sydney.
- It is essential that a package of bus priority measures, including a network of 24-hour bus lanes, be implemented in tandem with the construction of the Eastern Distributor, or preferably before its completion, in order to maintain the integrity of public transport in eastern Sydney.
- A bus priority plan should be agreed, funded and programmed prior to determination of the Environmental Impact Statement. This should include the design and funding of an interchange to service the Sydney Cricket Ground and the Sydney Football Stadium area. In addition, the proposal for the Anzac Parade and Moore Park Road intersection will need to be modified.
- The Eastern Distributor proposal will be enhanced by the provision of strategic bus priority measures on the road network in and around the proposed Eastern Distributor. However, these measures will need to be determined and implemented prior to the start of construction on the project.
- As part of the bus priority initiatives suggested in the submission (Section 4.4.4), transit lanes should be implemented in Alison Road and in Cleveland Street.
- The proposed traffic arrangements in Moore Park Road will affect the existing servicing arrangements for the Sydney Cricket Ground and Sydney Football Stadium area. The Environmental Impact Statement document provides no specific details on this matter, other than acknowledging the need for a servicing strategy and an interchange. It notes that a committee is currently examining the matter. It does, however, show the Driver's Avenue bus roadway closed.
- There is a need to develop an integrated bus interchange and servicing strategy for major events in this area. There were 71 events held at the Sydney Football Stadium and the Sydney Cricket Ground in 1995. Traffic conditions in the area are congested on such days for major events. Increased public transport usage on these days is the only effective means to reduce the traffic congestion and parking problems that occur in the immediate area.
- Previous discussions concerning servicing the Cricket Ground and Football Stadium area have suggested that a new interchange be located on the bus roadway adjacent to Gregory Avenue and Anzac Parade. As part of the new arrangement, the Driver's Avenue bus

- Sydney Buses is concerned that the changes at this intersection and the increased traffic flows along the corridor may precipitate the future closure of Epsom Road and Lenthall Street route by South Sydney and Randwick Councils.
- This particular route may be required for future bus operations and therefore should be retained.
- The proposed loss of the northern leg of the Anzac Parade busway between Gregory Avenue and Moore Park Road to the Centennial Park and Moore Park Trust (near Driver's Triangle intersection) is not satisfactory from a public transport point of view. The difficulty of predicting the traffic impacts around the Driver's Triangle intersection (post ED) is such that any proposal to remove the busway is damaging. Removal of the busway compromises the long-term improvement of mass transit operations through this intersection. This corridor is of strategic significance, with the potential for light rail investment, and must be retained.
- The intersection design for Moore Park Road and Anzac Parade will need to be modified to accommodate and retain the bus roadway. Sufficient capacity will be required at the intersection to enable all inbound buses to clear the bus roadway within one phase. Should capacity be considered a problem, then options to improve capacity are: to ban the right turn into Moore Park Road; and relocate the inbound tunnel portal to Anzac Parade and Moore Park Road.
- The alternative option DT3, which relocates northbound portals to Anzac Parade and Moore Park Road, rates similar to the preferred option (DT2) in the comparative analysis, but no plans exist for this and there has been no traffic modelling or separate costing.
- The STA has indicated that all regular route service buses will use the bus roadway and in the light of this responsibility for its maintenance, will need resolution.
- Public transport delivery and usage in the Anzac Parade corridor will be improved by re-routing all buses on Anzac Parade onto the bus roadway either at Alison Road or Robertson Road. The options to achieve this is either: access at the Alison Road and Dacey Avenue intersection; or via Robertson Road, with bus priority in Anzac Parade between Robertson Road, Alison Avenue and Dacey Avenue.
- For full benefits to be achieved, bus priority measures need to be implemented in Anzac Parade between Alison Road and the five ways roundabout at Kingsford, together with the implementation of a transit lane in Alison Road.
- The Eastern Distributor proposal incorporates a median closure at the intersection of South Dowling Street and The Crescent, retaining left in and left out movements at the intersection.
- This will affect a number of bus routes (310, 302, 303, 355, 375). The effect on these routes has not been identified in the Environmental Impact Statement.

- These bus routes will need to be re routed via the local street system or alternatively the proposal modified to allow grade separated right turns into, and out of, The Crescent.
- The re routing of the bus routes may require additional traffic management measures in the local street system and these should be agreed to and funded as part of the proposal.
- The re routing of the bus routes will increase bus operating costs, conservatively calculated to be \$400,000 per year. This is a direct cost to Sydney Buses and there is a strong case for compensation.

1039. LAM Nikolas (Marrickville-Sth Sydney Bicycle Group)

- Concerned about the impact of the Distributor on pedestrians. (refer to sub-issue bicycle and traffic for more detail).
- Opposed to the proposal as it would discourage and impede bicycle use in the area.
- The proposal does not accept cyclists and pedestrians of equal importance as motorists. There is little regard to the disruption to cycling and pedestrian routes which the Distributor would cause.
- Cyclists and pedestrians will be denied access to the shortest route possible, denying them the same rights as motorists to reach their destination in the shortest possible time.
- The alternative routes will not be safer for cyclists as many vehicles will use them to avoid tolls.
- Bicycle paths such as Anzac Parade are unacceptable to cyclists who wish to ride at greater than 15 km/h due to its poor surface and the danger of accidents with pedestrians and other cyclists.
- Safe "shortcuts" for cyclists (and pedestrians) such as the crossing lights between Cleveland Street and Drivers Triangle on South Dowling Street are to be removed, which will see more people running the risk of crossing the motorway, or reduced access to some areas for some members of the community.
- Intersections are likely to become more dangerous for cyclists. For example, making right turns off Dacey Avenue onto South Dowling Street.
- Increased traffic induced by construction of the Eastern Distributor will have negative impacts on cycling and cyclists in the surrounding areas. Increased levels of traffic is a recognised factor in deterring potential cyclists.
- The likelihood that cycling will become a prevalent form of transport, as fuel costs become unaffordable to most people, would see the Eastern Distributor and other motorways ending up as a waste of resources.

- It would be a shame to see funding wasted in order to provide several weeks of clear flowing traffic during the Olympic Games when long term solutions could be applied, for example, cycling.
- Increased air pollution by carcinogenic and other toxic engine emissions may degrade the health of cyclists and other members of the community who have increased respiration.
- The removal of the light crossing between Cleveland Street and Drivers Triangle will reduce access in some areas for some members of the community.

1040. FARLAND Geoff (Supa Centa - Landerer and Company Solicitors)

- The impact on the Supa Centa during construction of the ED will be substantial. For the 3 year period, increased levels of congestion will be experienced in Eastern Sydney. Access to the Supa Centa will be difficult and driver frustration will further reduce the number of people visiting the Supa Centa. The Environmental Impact Statement is unclear on the level of access that will be maintained in the vicinity of the Supa Centa. In particular the South Dowling Street and O'Dea Avenue intersection will experience considerable delays. Whilst a right turn movement from South Dowling Street to Todman Avenue may be reattained, considerable queues are likely to form and many potential customers deterred.
- During construction the level of pass-by shopper is likely to decrease substantially for the following reasons: the number of vehicles passing the Supa Centa's South Dowling Street frontage will be approximately halved, as only southbound traffic will be passing the site; the congestion and resultant driver street levels will reduce the likelihood of drivers stopping for pass-by visits; and the Supa Centa will be less visible during construction due to major earthworks occurring. The Environmental Impact Statement states that the proposed diversion of traffic during construction would potentially cause economic loss to some local businesses. It is likely that economic loss would not occur to some local businesses but would effect the majority of businesses along the corridor.
- The proposed South Dowling Street works will result in severe disruption to traffic flows during construction with the diversion off South Dowling Street via O'Dea Avenue and Crescent Street. The Environmental Impact Statement fails to provide adequate information on how the South Dowling Street intersections will be treated, and the traffic managed during construction works. The Environmental Impact Statement does not indicate whether the right hand turn into Todman from South Dowling Street will be maintained during construction.
- The significant traffic disruption, increase in traffic congestion and delays and general inconvenience and confusion of traffic diversions is unacceptable to the Supa Centa, particularly for a period of two years.
- The Environmental Impact Statement does not adequately describe the noise mitigation measures that will be constructed. The Environmental Impact Statement is misleading in its illustration of the proposals. The artists' perspectives do not show potential noise

mitigation measures. Acoustic barriers up to 4m high have a substantial visual and severance effect.

- The Director-General's requirements (Appendix B) requires that any LATM measures should be stated. Only a few LATM actions, particularly around South Dowling Street have been mentioned. Instead the Environmental Impact Statement says that local Councils and the RTA will be responsible for developing and managing local roads to mitigate adverse impacts (pages 5-49).
 - Airport Motorways LATM proposals are not adequately discussed. The LATM is not area wide and is wrong or misleading in matters of detail such as the Appendix G drawing "removal of traffic signals" from Link Road (Figure 7.5b clearly shows proposed traffic signals) and "allow movement which is currently banned" for the right turn into Todman Avenue (exists now). Clause 85 of the EPA regulation 1994 has not been adequately addressed.
 - The inadequacy of the proposed LATM is highlighted by the statement (pages 5-51) that the total value of the LATM program including work on Crown, Bourke, Oxford and Flinders Streets would be in the order of \$1m. This treatment of a major local impact is less than one quarter of one percent of the \$404.5 million estimated cost of the Eastern Distributor construction.
 - The Director General's requirement of "assessment of the local redistribution in the local and regional road networks, including prediction of future traffic volumes and characteristics such as percentage of through and local traffic and amount of heavy vehicles..." has not been satisfied. There is not data on origins and destinations. No trip tables. No quantification of intersection delays or level of service. No plans of modelled traffic volumes other than along the Eastern Distributor route. To adequately assess the effects of the proposed motorway, traffic volumes are required across the metropolitan area.
 - The Environmental Impact Statement relies on future development and implementation of LATM to achieve outcomes as detailed in Sections 5.2.3, 5.3.1, 10.4.2 and 5.3.3. In the absence of any LATM proposals to address traffic on the surrounding road network, the impacts of the proposed development can not be determined and there is no assurance that such outcomes can be achieved.
 - The Environmental Impact Statement's economic analysis does not fully account for the disruption costs during construction of the Eastern Distributor. This is contrary to section 4.2.8 of the RTA's Economic Analysis Manual.
 - The analysis only identifies two types of construction cost which are: the physical construction and annual maintenance costs and a one-off relocation and disturbance cost representing the cost to property owners and renters of having to move against their will. This is deficient.
- ⇒ It fails to account for the cost of disruption to traffic during construction. It is likely that the three year construction will result in horrendous disruption of traffic. The cost

roadway would be closed. This interchange and servicing strategy will need to be determined as part of the Environmental Impact Statement process.

- Sydney Buses position is that the new bus interchange will be provided and funded as part of the Eastern Distributor proposal. The surrender of the Driver's Avenue bus roadway is conditional on this agreement.
- Proposals for local area improvements should be designed with bus operations in mind. Often improvements to street scapes, such as parking bays, footpath widening etc, reduce the opportunity for bus priority measures and may provide disbenefits to the community.
- The RTA has indicated that specific plans for Local Area Traffic Management and Access will be developed and exhibited at the time that determination of the Eastern Distributor Environmental Impact Statement is made.
- In order for the ED to be viewed as a complete transport project, the Department of Transport recommends that these plans and the Environmental Impact Statement be determined at the same time. This will ensure that the impacts are adequately addressed, that public transport access is maintained during construction and enhanced by the proposal, and that intended works are fully costed, funded and programmed.
- The Eastern Distributor will reduce cross-movements in Crown Street (at William Street) and turning movements into Riley Street from William Street. This will allow the introduction of some form of bus priority in William Street to cater for the bus services using the William Street and New South Head Road route. Some 78,000 bus passengers per week and 532 buses per day travel on this section of William Street.
- The Environmental Impact Statement suggests a possible transit lane and peak hour bus lane in William Street, west of the Eastern Distributor.
- Bus lanes and priority measures are required in both directions in William Street for 18-24 hours per day. Peak hour bus lanes should be implemented in the first instance, together with bus priority measures at intersections.
- Priority measures should be implemented between Elizabeth Street in the City and extend to Double Bay.
- The Eastern Distributor should allow the opportunity to introduce bus lanes (full time) in Albion and Foveaux Streets through capacity improvements at the major intersections.
- These measures will benefit buses which service the Central and Elizabeth Street spine for the CBD area, as well as the University services and Special Event services. As these arrangements will be implemented on a full-time basis, there will be no need to implement addition arrangements for Special Events.
- Sydney Buses runs a number of bus services along Crown and Bourke Street between The Crescent, Campbell and Albion Street.

- The Environmental Impact Statement document suggests that both roads should be returned to two-way flow, retaining a midblock capacity of one lane in each direction.
- The existing one-way arrangements should be retained for the following reasons: simplified phasing at the intersection with Cleveland Street; it allows parking to be retained on both sides of these streets right up to major intersections; it allows a full-time bus lane to be allocated together with one single lane from traffic; and it enables footpath widening at bus stops and at intersections along each street.
- The retention of a single lane for general traffic together with narrowing at intersections along the roads will restrain traffic volumes using these routes, while ensuring that other objectives for public transport and local amenity are met.
- The proposed traffic management treatments at major intersections along these routes should be selected so that bus operations are not disadvantaged through inappropriate treatments or facilities.
- Sufficient funding should be provided to ensure the selection of appropriate facilities.
- Significant traffic diversions are required during the construction phase. Levels of delay to bus services would increase substantially and it is proposed by the RTA that the northern end of the Anzac Parade busway be used by general traffic during the construction of the Anzac Parade portal.
- Special events traffic to the venues located near the corridor is substantial in a regional context (Sydney Cricket Ground, Sydney Football Ground, Fox Studios, Moore Park and Randwick Racecourse). The construction phase will erode the ability of STA to service these venues with effective operations.
- During construction it will be essential that buses and bus priority measures be favoured over general traffic during each and every stage of work.
- During construction, separate bus lanes must be provided during the work in the Driver's Triangle area, if alternate plans that do not disadvantage buses cannot be implemented.
- During construction, where bus services are disadvantaged and/or affected by traffic diversions, special priority measures should be implemented.
- During construction, work should be undertaken outside of peak hours and business hours where practicable.
- These measures should be agreed and included in the Environmental Impact Statement before determination.
- It is recommended that a Staging Construction Committee be established to assess the required measures during each stage of construction and approve the implementation of additional works. The Department of Transport and STA should have representation on this committee.

of this disturbance, particularly in travel time disbenefits, should be accounted for. With the first year travel time benefit of the Eastern Distributor valued at over \$63 million, travel time benefits of disbenefits have a considerable effect on the results of the economic analysis.

- ⇒ The analysis fails to account for the economic loss suffered by businesses during the construction period. Access to business in Eastern Sydney, not only those located along the route, will be severely restricted.
- ⇒ The relocation and disturbance costs do not account for the disruption to local neighbourhoods caused by the re routing of traffic along lower order streets. The analysis only accounts for those property owners or renters having to move. Apart from vehicles using official detours, motorists will use residential streets in an attempt to avoid the disruption.
- The value of the above costs are intensified as they occur at the beginning of the thirty year analysis period and therefore incur a minimal discount factor.
- The economic analysis does not make any allowance for the decreasing level to service that would be provided as traffic increases on the Eastern Distributor. The travel time benefits arising from the operation of the ED were linearly interpolated between 1996 and 2011 and assumed to remain constant thereafter. It could be expected that resultant travel time savings would decrease in 2011 as increasing congestion occurs.
- All government policy says they are not trying to satisfy demand for car travel in the commuter peak hour. The Environmental Impact Statement traffic and economic analysis is based on a factored up model of the morning peak period which does not include truck or commercial traffic. The Environmental Impact Statement states that trucks will use other parallel routes. Tolls for trucks are proposed to be double the tolls of cars. As dangerous goods would not be allowed to enter the proposed tunnels, drivers would continue to use the existing surface roads. Therefore trucks will not receive the full benefits of the ED and government policy will not be satisfied.
- There is insufficient economic, cost and financial data in the Environmental Impact Statement to test the feasibility of delaying the construction of South Dowling Street section of the proposal.
- The proposed South Dowling Street upgrade works will require the resumption of land along the entire South Dowling Street frontage of Moore Park. The loss of this space will have a negative impact on the open space network of Moore Park, particularly with respect to the role of the park as a gateway to Sydney and as an important civic and historical urban space.
- The landscaping works and urban design initiatives to protect and enhance Moore Park, and to ensure that the heritage significance of the space is undermined, have not been resolved. Given the significance of the space it is unacceptable.

- The Environmental Impact Statement states that the Eastern Distributor would cater for increased demand along its corridor but it is expected to be close to capacity in 2011. The Environmental Impact Statement does not explain what will happen to traffic once capacity is reached.
- The Eastern Distributor as proposed will result in major increase in traffic, which will place a further strain on Sydney's congested road network and will increase air pollution. By nature, the motorway proponents aim to attract traffic and hence generate revenue. The Eastern Distributor will induce car traffic resulting in more vehicular trips. This is undesirable and incompatible with a number of recent Sydney metropolitan area planning documents.
- No traffic count or turning movement data is presented to support the Environmental Impact Statement assertion that current operating conditions are congested near the Supa Centa. The aerial photos shown in Environmental Impact Statement Figures 7.4a and 7.5a show no substantial queues or congestion. Although the photos may be taken around midday, they support the Supa Centa's view that in the short term the controlling congestion acting as a constraint on corridor capacity is concentrated further north to the city.
- The Environmental Impact Statement fails to provide an adequate level of design detail relating to South Dowling Street and to present and evaluate appropriate mitigation strategies to deal with the environmental impacts of those works.
- The South Dowling Street component of the Eastern Distributor development is unacceptable. There is no quantification of benefits for South Dowling Street in terms of traffic flow improvements, intersection capacity improvements and travel time improvements.
- There is not adequate consideration of east-west movements across South Dowling Street. The proposed Dowling Street works shift the problem.
- The South Dowling Street works should be deferred until there is: resolution of key outstanding issues (local traffic management and cost/benefit); proper community consultation upon completion of studies; completion and commissioning of Taylor Square works further north; a full and proper evaluation of those works on South Dowling Street and whether South Dowling Street works are necessary; a completion of the NEW SOUTHERN RAILWAY; planning studies for the Green Square; and area and other major redevelopment on the western side of South Dowling Street.
- The speed data from the Environmental Impact Statement suggests that the section of the Eastern Distributor route currently operating at the poorest level is between the Cahill Expressway and Fitzroy Street and Moore Park Road. Significant benefit would be achieved by upgrading this part of the route. In comparison other arterials such as South Dowling Street are experiencing an average morning peak speed of 25 km/h, which is not unreasonable. The intersection of South Dowling Street and Lachlan Street is expected to perform the 'same' in the future. Visual observation of the route in peak periods and inspection of the data shows that the major levels of congestion are experienced in the

- Page iv of the Environmental Impact Statement stated, "The traffic modelling indicates that the proposal would not significantly increase total kilometres travelled on the road network". This statement is not supported by traffic data.
- Chapter 6-5 states that "the predominant mode of travel in the morning peak is by car" This is not true in central Sydney where car drivers and passengers comprise only 31% of trips on weekdays or in south Sydney where over 50% of trips to and within South Sydney are by public transport.
- The practice of using two different models and teams - EMME2/EMMEZ and TRACKS - in the Environmental Impact Statement traffic modelling and then reporting these as high and low scenarios is unusual. The credited with EMME2 modelling has closed. The Environmental Impact Statement acknowledges shortcomings in contemporary modelling, but it is unusual to make comments such as "the toll sensitivity in the TRACKS modelling is much higher than is likely to occur". Why were the best estimates/calibration not applied? and "the TRACKS numbers on Crown Street are lower than may be achievable in local area traffic management". Why are they lower than even managed flow estimates?
- In a congested urban network it is important to model a wide area of the metropolis so that diversion effects can be seen. The Environmental Impact Statement does not describe the extent of the road network modelled or model parameters. The discrepancies range between the modelled flows are not trivial in many cases even where they are shown. Table 5.7 show Crown Street estimates with the Eastern Distributor vary from low travel demand of 4800 vehicles per day to a high travel demand of 13600, or without the Eastern Distributor from 27300 to 16700. Variations of several hundred percent.
- The Environmental Impact Statement case for grade separation includes the need to maintain a good level of service for east-west traffic crossing the Eastern Distributor. In the case of Lachlan Street and Dacey Avenue, forecast traffic without the proposal ranges from 13100 to 38900 vehicles per day. An almost tripling in traffic makes a big difference to intersection capacity.
- As part of the South Dowling Street works it is proposed to remove the traffic lights from the intersection of Crescent Street and to restrict movements to left in and left out only at the intersection of Link Road. The traffic modelling suggests these measures will result in improvement to these intersections. However, traffic currently using these intersections will be diverted to O'Dea Avenue and Lachlan Street, resulting in increase in traffic in these intersections by 297% (13,100 to 38,900). This intersection operates at an unacceptable level and this will worsen. The reductions in capacity of these intersections may outweigh the benefits of South Dowling Street works and construction of north-south link.
- The modelled years are 1996 and 2011, some 15 years apart. An intermediate year scenario would have been expected due to the considerable doubt over the future urban form of the city south region, and issues such as the second airport and the M5 East. Intermediate projections for traffic volumes and trip patterns need to be considered, particularly in the context of so many unknown variables in changing land use.

- As stated in the Environmental Impact Statement, significant flooding problems are known to occur along South Dowling Street at low points in the road. There is no flood mitigation or system upgrade proposed as part of the South Dowling Street works and potential flooding problems external to the street have not been addressed (10.6.2). The Environmental Impact Statement acknowledges that as a result of the widened road surfaces, run off flows will increase, and that flood protection to the 20 year average recurrence interval level is probably not possible with road discharge draining into the existing infrastructure. This is unacceptable.
- Apart from road pricing via a toll, the scheme does not include any measures to reduce, spread, divert or transfer car usage as recommended in Future Directions.
- The Eastern Distributor as proposed is not in the best interests of the wider community. The Eastern Distributor does not support the Integrated transport Strategy. The tunnel on South Dowling Street would encourage long distance car traffic at the expense of convenient accessibility to local services such as the Moore Park Supa Centa.
- There are a number of key strategic planning issues relating to the circumstances of the proposed South Dowling Street works that at present are unresolved. These include development of: the M5 corridor; NEW SOUTHERN RAILWAY; southern arterial/Bourke Street link; and future planning for Kingsford Smith and Badgerys Creek Airports. These will add new constraint and opportunities for South Dowling Street.
- The cost/benefit is poor for South Dowling Street (and lacks community support). It would be more satisfactory to transfer funds allocated for South Dowling Street works to the Toll Booth and Art Gallery tunnel, should this option be pursued.
- The Frank Saywell Kindergarten and Basketball Courts at the corner of Fitzroy and South Dowling Streets are to be demolished and relocated. It is acknowledged in the Environmental Impact Statement that to date the relocation of these community facilities has not been resolved. Relocation of these facilities is likely to result in inconvenience to parents and children using these facilities.
- From Part M of the Director's requirement it is not clear in the Environmental Impact Statement whether the following bodies have been consulted: Department of Health; National Parks and Wildlife Service; Commonwealth Environment Protection Agency; Sydney Cricket and Sportsground Trust; Royal Agricultural Society; Telstra Corporation; Total Environment Centre; SCEGGS; Darlinghurst; and Central Sydney Community Transport Group.
- Community consultation after the Environmental Impact Statement process removes the statutory requirement for public participation in the decision making process. With major works committed at the detailed design stage, the retrofit mitigation attempts would be band aid measures.
- The level of community consultation in the South Dowling Street area has been inadequate.

section along Flinders, Bourke and Crown Streets. South Dowling Street is observed to operate at a reasonable level of service for most periods of the day.

- The grade separation tunnel of South Dowling Street through the intersections of Dacey Avenue and Todman Avenue proposed in the Environmental Impact Statement should not proceed because the transport studies reported in the Environmental Impact Statement do not address the reduction in traffic access to the site. The traffic studies reported are ill-considered and prepared in haste. The many minor errors suggest that there may be other fundamental errors, but there is insufficient data provided in the reports and working papers to allow independent transport analysis, particularly within the 30 day exhibition period.
- The scheme is presented as one huge scheme. There is no discussion of why this was preferred over staging of various components. There is no justification for the outlay of over \$400 million in one project. For a project of this size, there should be a considerable discourse on the possibility of staging the various works and their respective priorities.
- The project should be staged, with Stage 1 comprising those works to the north of Fitzroy Street and Stage 2 comprising the South Dowling Street Works. However an alternative proposal for undergrounding the roadway and tollbooths at the Art Gallery has been put forward. This proposal warrants serious consideration. It may be appropriate to stage the works as Stage 1 - Taylor Square tunnel works; Stage 2 - Toll booth/Art Gallery works; and Stage 3 - South Dowling Street works.
- There is a lack of consideration for the effects of the M5 east. If the two projects were constructed they would have a major effect on traffic in Sydney, as much of the proposed orbital would be in place. The effect of the M5 can not be brushed off in the Environmental Impact Statement with "the inclusion of the M5 east (in the modelling process) is expected to have limited effect on the Eastern Distributor" (Working Paper 8-3). It is totally inappropriate to make this claim without data to support it.
- The design detail of the M5 East proposal is critical to the full understanding of the operation for the Eastern Distributor and in terms of the broader traffic impacts on Sydney. The cumulative impacts of the two road proposals should be considered as part of the integrated transport system. As the closing dates for the submissions for the ED occurs prior to the public exhibition of the M5 East proposal, such consideration is not possible. This is unacceptable.
- The modelling presented in the Environmental Impact Statement would suggest that the Lachlan Street, O'Dea Avenue and South Dowling Street intersection is severely over saturated and a major constraint on the road network. However, the visual inspection of the intersection's performance during peak periods suggest that its operation is not as bad as suggested. It is possible that the excessively poor rating in the morning peak is due to the congestion effects that occur to the north towards the CBD. With some improvements the intersection could remain at grade until approximately the year 2005. Figure 4.6 d of the Environmental Impact Statement show that there is a considerable amount of land zoned as 'County Road Reservation' in the vicinity of the intersection. The capacity of the intersection could be increased by:

- ⇒ providing an additional lane on the south side of Dacey Avenue, allowing the median lane to become a designated right turn lane;
 - ⇒ providing an additional lane on the east side of South Dowling Street, between Todman Avenue and Cleveland Street. The road centreline could then be adjusted to allow four northbound lanes and three southbound lanes. the signal layout at Todman Avenue and Dacey Avenue could be adjusted to accommodate this;
 - ⇒ leaving Crescent Street open to the motorway as per the existing layout, to reduce traffic in Lachlan Street. Investigation will be required to determine whether the tunnels under Cleveland Street can physically accommodate an at-grade Crescent Street junction. These improvements would primarily use County Road Reservation land and some Moore Park land that is to be acquired as part of the proposal.
- The intersection of South Dowling Street and Lachlan Street is anticipated to perform the "same". This intersection will experience a considerable increase in traffic in Lachlan Street. It is believed much of this increase is due to the modification at Crescent Street to the north, which will become left in and left out only. The motorway proponents state that the grade separation is required to maintain the same level of service, as there will be a considerable increase in traffic through the intersection. The trend will also occur at a number of other intersections, as the motorway nature limits access and in doing so confines traffic to fewer, more saturated intersections.
 - Figure 5b does not show the existing right turn ban from Lachlan Street to South Dowling Street.
 - The justification for the Eastern Distributor is based on "peak" period traffic levels, not the traffic levels experienced throughout a typical week. This opposes recommendations of the RTA's Future Directions report which favours an integrated demand strategy. "Manage peak demands on road networks to reduce, spread, divert, transfer or accommodate car usage in accordance with demand management principles". "Provide urban road network capacity to meet 12-hour needs". The Eastern Distributor is not compatible with the aims of the two strategies.
 - The basis for the Eastern Distributor traffic modelling is not clearly stated. It is unclear whether the proposal is justified on the basis of peak period traffic or traffic in non-peak periods. It is likely that some components of the scheme are justified for all periods of the day. Other components may only be justified for peak period traffic levels. If this is the case it opposes the aim of providing reasonable levels of capacity over a 12 hour period, not just focussing on the shorter peak period.
 - For a project of this magnitude, the level of traffic and transportation data provided in the Environmental Impact Statement and working papers is inadequate. Working Paper 3 contains little more than what is contained in the Environmental Impact Statement. The lack of data means that the traffic engineering in the Environmental Impact Statement is unable to be verified. Various scenarios are unable to be tested. This suggest that major traffic effects of the Eastern Distributor are not revealed.

- The South Dowling Street works, which will increase the volume of traffic accessing the road system will increase vehicle emissions along South Dowling Street by some 25-35% for all pollutants. Despite the claim that air quality along the roadway will remain within EPA goals, such reduction in air quality should not be considered acceptable, particularly given that air quality along South Dowling Street is relatively good.
- Landscaping works and urban design are considered critical components of the development, essential to consideration of the visual impact and to the impact of the proposed works on the heritage significance, in particular Moore Park. Detailed information relating to landscape treatment will not be made available for public comment until after submissions close for the Eastern Distributor. Informed judgements can not be made on the adequacy of these measures.
- The landscaping setting along the edge of Moore Park will be adversely affected by the proposal. Specific proposals to protect the amenity of the park and soften the visual impact of the proposed road widening and tunnel structures have not been resolved.
- It is noted that the palm trees recently planted along the central medium of South Dowling Street (at considerable cost to South Sydney Council) will have to be removed to accommodate the proposed works.
- Proceeding with the South Dowling Street works at this stage is premature and pre-empts the changing land use and transport planning circumstances in the area without adequate opportunity to fully consider the likely form, extent of impacts of these changes. The proposed Dowling Street upgrade would be better considered in the context of the City South Strategy and the outcome of planning initiatives being undertaken by the South Sydney Development Corporation and South Sydney Council for the Green Square area. A Masterplan is currently being prepared for the Green Square urban renewal (South Dowling Street between Crescent Street and Epsom Road). DUAP is involved in a strategic planning project for City South Project. Included in this study is an Economic gateway study, a freight movement study and a strategic planning study which focuses on Green Square, Port Botany and Sydney Airport. Other redevelopment sites include Department of Defence site and ACI site. These developments will have considerable impact on population growth, commercial development patterns, traffic generation and trip demand patterns, as well as opportunities for public transport improvements. They will establish new constraints and opportunities for the South Dowling Street area.
- The Environmental Impact Statement does not adequately explain why the Eastern Distributor has grown to include South Dowling Street and General Holmes Drive, from its initial corridor of the Cahill Expressway to South Dowling Street. Section 6.4.7 of the Environmental Impact Statement refers to options for South Dowling Street. Option SDS1 (do nothing option) performs poorly in the comparative assessment, particularly in the categories of design objectives and level of service. The Environmental Impact Statement does not say why the "do nothing" option is unacceptable in terms of level of service. Issues which should have been addressed include: asking when is SDS1 unacceptable, ie year 1996 or 2011?; and could the northern part of the scheme operate

successfully without the construction of option SDS3?; and were minor intersection improvements considered in the short to medium term?

- Do-nothing is not a reasonable base for evaluating the scheme. If the Eastern Distributor did not proceed there is no way the authorities would allow 15 years to elapse with no road improvements. At very least a comprehensive do-minimum solution should have been considered as a base case for traffic and economic analysis. Table 10.1 again shows relative performance of intersections both with and without the Eastern Distributor, instead of a comparison with the do-minimum solution.
 - The comparative assessments of options refer to "relatively positive". If from the base of "unacceptable" do-nothing option does this merely mean better than unacceptable? There is no quantification of how "relatively positive" is based.
 - The Environmental Impact Statement fails to adequately demonstrate: that all feasible options for the South Dowling Street section have been examined; that all relevant factors, including environmental factors, have been part of the decision making process; and how the decision on the preferred option was made. The Environmental Impact Statement has not adequately detailed the process of selection of options nor how environmental factors were considered and weighted.
 - Existing noise levels at residential areas along South Dowling Street have already exceeded the RTA and EPA base noise level objectives. The Environmental Impact Statement makes a vague statement at Section 10.9.5 in relation to the proposition that faced treatment may be an effective means of ameliorating noise for residences along South Dowling Street. However, no measures are proposed and no mechanism by which this issue may be resolved are presented. This is unacceptable and contrary to the earlier assertion in the Environmental Impact Statement (10.9.2) that, regardless of whether the proposal would increase or decrease existing noise levels, where noise levels exceed TNL 55, the RTA will make its best endeavours to meet TNL 55 using all practicable measures to reduce noise impacts.
 - Any additional unmitigated noise impact, on an area of sensitive residential land use already subjected to unacceptable noise impacts, is inappropriate and unacceptable. The cumulative effect of all noise sources acting together in an area is known as "creeping" background. For ideal planning purposes, where the existing background noise level exceeds the recommended acceptable level, as in South Dowling Street, new development should be planned to "hold" the background level and prevent creeping.
 - The proposed works do not contribute to the achievement of ESD principles of State and Federal Government and does not reflect the opportunities identified for the corridor in recent State Government policy publications.
- ⇒ Initiatives for public transport have not been resolved and the proposal will result in a significant increase in private vehicle trip demand. No public transport initiatives are identified for South Dowling Street.

- ⇒ The need for improvements in the road movement of commercial and freight traffic (as opposed to private commuter trips) which can not be readily handled by other modes has not been satisfactorily addressed. Commercial and freight traffic will be actively discouraged from using the road corridor through the imposition of a toll. Traffic modelling used in the Environmental Impact Statement does not indicate the composition of traffic using the corridor, and therefore does not demonstrate any benefits to commercial and freight traffic movements through the area.
- ⇒ The proposed South Dowling works will result in adverse noise impacts, a reduction in air quality and a reduction in the area of open space available in the inner city. There is insufficient detail and consideration given in the Environmental Impact Statement to the measures that will be implemented to protect the environment both during and after construction from increased traffic, flooding, stormwater runoff etc. These impacts are contrary to the achievement of ESD principles.
- The proposed South Dowling Street works will have an unacceptable impact on the residential areas adjoining South Dowling Street in terms of community severance, particularly in respect to Moore Park.
- The state Road Network Strategy "identified the need for the RTA to move away from continuing to build roads in an attempt to satisfy ever increasing demand. It adopts demand management rather than demand satisfaction and suggests limits on new road provision focused on peak period needs of commuters and instead emphasises road provision for public transport, high efficiency passenger and freight vehicles and all day transport needs. The needs of the Supa Centa are concentrated in shopping hours and weekends and do not add to the commuter peak. The local access needs of the Centa are consistent with the RTA strategy.
- The Environmental Impact Statement did not describe proposed signage in any detail. This is essential for understanding the way traffic will impact on the Supa Centa and local areas.
- There is insufficient economic, cost and financial data in the Environmental Impact Statement to test for the feasibility of delaying the construction of the southern section. The marginal additional benefit is questioned over cost for the South Dowling Street section (Dacey Avenue to Todman Avenue), if its cost is \$50m to relieve a secondary constraint on tollable traffic. The additional cost must also increase the construction and delivery risk in the lead up to the Olympic Games.
- It is considered once the real costs of the proposal are included (acquisition, relocation and disturbance, maintenance and operating costs) that the costs of the South Dowling Street section will be \$80 million. Given there are significant problems associated with the South Dowling Street works the failure to clearly demonstrate the benefits of the works is unacceptable.
- The main restriction on access will be for motorway traffic, due to the significant distance from the Supa Centa that a decision to visit the site has to be made and the lack of a "second chance". If approaching from Southern Cross Drive drivers must divert to the

"northbound access Road" before Link Road, some 1000m prior to the Supa Centa. Decisions to visit the Centa have to be made 300m advance of the turnoff. This represents the one and only opportunity to access the Supa Centa for northbound traffic. If the driver fails to make the diversion at Link Road, the next opportunity to exit the motorway is Cleveland Street. Access would then be by a circuitous route using either Bourke Street and O'Dea Avenue or Anzac Parade and Dacey Avenue.

- Drivers approaching from the north via south Dowling Street face similar problems. Drivers must exit the motorway opposite Crescent Street and proceed at-grade to Todman Avenue, at a distance of 400m. If the driver fails to make this diversion, the next available exit is not until Wentworth Avenue in Eastlakes, some 3.8km south of the Supa Centa.
- The Environmental Impact Statement did not describe proposed signage in any detail. From a commercial perspective signage near the site would not be much use, because the tunnel cross section would not allow any of the motorway traffic to see the Centa as they pass by.
- For the majority of potential pass-by shoppers it is unlikely that those missing the most convenient motorway exit would use a circuitous route to access the Supa Centa, they would not visit at all. This represents a considerable loss in patronage to the Centa, particularly as the level of pass-by shoppers is estimated to exceed 20% of all customers. It is unclear from the Environmental Impact Statement whether the two intersections providing access to the Supa Centa from South Dowling Street will provide the same freedom of movements as is currently available.
- For Todman Avenue this intersection is predicted to operate "better" than its current performance. This may not apply to Supa Centa traffic. Only one right turn lane will be provided for drivers approaching South Dowling Street from the south. The intersection layout will be essentially as existing, with South Dowling Street traffic tunnelled.
- Those accessing the Supa Centa from Lachlan Street will be able to perform a right turn manoeuvre into South Dowling Street and then proceed to Todman Avenue. Due to the increase in traffic through the intersection and lack of dedicated right turn lanes, this manoeuvre may be subject to significant delay. It is not possible to quantify this as there is insufficient data provided in the Environmental Impact Statement.
- The proposed tunnel under South Dowling Street will: reduce the legibility of the road system for customers; reduce accessibility and convenience of access to the Centa; reduce the Centa's road frontage exposure; and negate recent traffic management initiatives.
- There are sufficient errors, omissions and inconsistencies in the Environmental Impact Statement that confirm concerns that the process has been ill-considered and prepared in haste. There is no proof that the construction of the southern section of the proposal near the Supa Centa is justified.
- Mandatory requirements with respect to transportation were not dealt with by the Environmental Impact Statement, including the economic impact, LATM and noise mitigation measures.

- The Eastern Distributor will have a detrimental effect on turnover of the Centa, as access from South Dowling Street will be considerably more difficult and the exposure to passing traffic will be reduced. Successful retailing depends in part on visibility and easy access.
- Although total traffic passing the Supa Centa along South Dowling Street is to increase by 31% (2011) there will be less surface traffic passing the site, as much of South Dowling Street will be tunnelled. This will mean that there will be a reduction in business from passing traffic and a reduction in potential trade due to decreased viability of the Supa Centa. This will increase motorist frustration and reduction in perceived convenience.
- The South Dowling Street works will have adverse economic impacts on the operation of the Supa Centa due to: loss of visibility; reduction of access; and construction disruption.
- With impulse buying or passing trade representing a significant proportion of total shopper trips, visibility and relative ease and access of clarity is important for trade performance. Retail success depends on positive visitor experience to encourage return trips.
- Construction of the South Dowling Street Tunnel will reduce ability to attract passing trade, which will contribute to a portion of motorists not noticing the Centa and therefore not visiting it at a later date. This will reduce the retail performance of the Supa Centa.
- The Environmental Impact Statement fails to provide adequate justification for the proposed South Dowling Street works on economic, social and environmental grounds. The Environmental Impact Statement identifies a number of environmental impacts that will result from the proposed South Dowling Street works which have not been sufficiently described or quantified. These include: a reduction in air quality (10.8); an increase in noise emission (10.9); an increase in volumes of traffic (10.4); a reduction in the level of service of the intersections of Cleveland Street, Dacey Avenue, O'Dea Avenue and South Dowling Street (10.4); an extended period of traffic chaos during construction works (9.2.7); an adverse economic impact on adjoining properties (9.11.2); a loss of open space and park land (9.5.4); and a worsening of community severance (9.2.4& 10.1.3).
- With the exception of an improvement in performance of the intersection of Crescent Street and South Dowling Street, the Environmental Impact Statement does not clearly indicate any specific environmental benefits that will be achieved through the implementation of the South Dowling Street works.
- The South Dowling Street section of the proposed Eastern Distributor is being driven by the desire to increase the capacity of the road system and fuel the movement of a greater number of private vehicles through the corridor, thereby achieving maximum profit return to the proponents. Justification of a new road proposal on the toll dollar, rather than sound environmental planning is unacceptable.
- The Environmental Impact Statement has failed to provide justification based on RTA's Environment Manual Volume 3.(page 42). The Manual states that an Environmental Impact Statement should include as a minimum justification for a proposal based on economic, biophysical, social and ESD grounds. How were all relevant factors, including environmental factors, considered when selecting and examining options. The Manual

notes that it is not sufficient to demonstrate that options have been selected on the basis of financial or engineering constraints and their likely environmental impacts subsequently examined.

- Figure 5.7d is difficult enough to relate to Table 5.7 without station 9 being incorrectly labelled as Southbound Surface Lanes.
- The Environmental Impact Statement is misleading in its illustration of the proposal. Noise barriers are not included in artists perspectives. Unrealistic low numbers of cars are shown on the road. Figure 7.1b does not show the toll booths on William Street exit, which may lead people to wrongly assume that there is not toll for traffic exiting at this location.
- The Environmental Impact Statement fails to meet the statutory obligations of the Environmental Planning and Assessment Act with respect to having full and proper regard to the requirements of the Director-General and DUAP pursuant to Clause 85 of the Environmental Planning and Assessment Regulation and to matters included in Schedule 2 of the Regulation. The Environmental Impact Statement has failed to meet the following parts of the Director's requirements: Parts B, C, D, E, H and K. The Environmental Impact Statement has failed to meet parts 3, 4, and 5 of Schedule 2 of the regulations.
- The Environmental Impact Statement has provided inadequate or incomplete information to allow a full and proper assessment of several issues relevant to the assessment of the proposed South Dowling Street works. The Environmental Impact Statement has failed to describe in detail all the components of the South Dowling Street works and identify and evaluate appropriate measures to mitigate the potential environmental impacts of those works, including traffic impact, visual impact, environmental impact, impact on residential amenity, impact on heritage significance, and economic impact.
- Sufficient detailed information has not been provided on: the location; scale; material; finish and form of tunnel portals; road widening; ventilation; street furniture and other elevated structures; proposed landscaping works and other associated urban design treatments; proposed traffic management and access arrangements during construction; the proposed location and treatment of pedestrian crossings; the design, location and visual impact of noise barriers; proposed drainage and stormwater works; and the proposed staging and construction program for works.
- The approach of deferring the consideration of detailed design and the development of strategies to mitigate environmental impacts is inappropriate and unacceptable. (eg location of carriageways, corridor boundaries, interchanges and intersections, road profiles, earthworks, construction staging, methods, landscaping, noise mitigation and traffic management). By failing to provide sufficient detail in relation to these matters the Environmental Impact Statement has failed to address all issues to make a decision. The degree of risk cannot be determined or whether it will operate in an environmentally acceptable manner. The community is not given the opportunity to consider and comment on issues critical to understanding the full environmental consequences. Issues will be resolved after submissions are closed for public comment.
- Critical impacts of the proposed development are meant to be ameliorated by further studies, design development and management plans. The Environmental Impact Statement does not propose or evaluate appropriate mitigation strategies for: local area traffic

management; the enhancement and protection of visual amenity; heritage conservation management; access improvements; the protection of residential, pedestrian, cyclist safety; and amenity and flood mitigation/control of stormwater. Mitigation strategies should be included as part of the Environmental Impact Statement and it is essential that the proponent demonstrates that they are capable of complying with statutory obligations under other licences or approvals.

- The Environmental Impact Statement defers the responsibility for the introduction of strategies to address environmental impacts to third parties, particularly councils. This is inequitable and will result in fragmented and inconsistent approach to decision making.
- The Environmental Impact Statement does not meet the RTA's Environment Manual (page 41) for South Dowling Street as there is not sufficient information. More detailed information is provided for the northern section of the proposal, this is inequitable and not satisfactory. The accumulation of significant "unknowns" in relation to environmental impacts should result in refusal or deferred decision pending all information of deferred in part.
- Past schemes for the Distributor have focused on the section of the proposed route between The Domain and Anzac Parade. None have included major works on South Dowling Street. The 1985 proposal did not include any improvements on South Dowling Street south of Anzac Parade. The Environmental Impact Statement stated that "South Dowling Street functions as a major arterial road and must absorb nearly 50% more traffic if the proposal is to work". The Environmental Impact Statement did not refer to any capacity restraints that would prevent this traffic from being accommodated on South Dowling Street. The reasoning why the major upgrading of South Dowling Street was included in the current Eastern Distributor is not clearly explained in the Environmental Impact Statement.
- The Supa Centa and other landowners along South Dowling Street developed in good faith that the Eastern Distributor did not include major works in this thoroughfare.
- When the Supa Centa site was purchased and developed, proposals for undertaking work along South Dowling Street had not been presented to the community. Therefore the Supa Centa had a reasonable expectation that the access arrangements on the site would remain unchanged and that significant retail benefits offered by the South Dowling Street site would continue.
- Almost half of the Supa Centa's customers approach via South Dowling Street. Major works on South Dowling Street, in particular the containment of through traffic in tunnels would have a considerable negative impact on turnover. Level of turnover is closely related to the ease of vehicular access to the site. This is reflected in an increase in the overall turnover in the last three years of 400% on 1992 levels. The recent introduction of a right turn lane from South Dowling Street into Todman Avenue has greatly improved access.

1041. BARON Gil

- They have provided a proposal for access to Link Road for southbound traffic on South Dowling Street. The proposal was prepared by Sinclair Knight Merz on behalf of Baron and Associates. They propose to provide southbound off ramps on South Dowling Street and either a tunnel or flyover to access Link Road. At Epsom Road they propose the same system for access to Epsom Road.
- Concerned that the removal of the right hand turn lane from South Dowling Street into Link Road will inconvenience them. They would prefer that the right hand lane maintained.
- Their clients are concerned that with the removal of the right hand turn lane from South Dowling Street to Link Road the value of property in this area will be reduced due to the restricted access to Link Road.
- They are concerned that with the removal of the southbound right hand turn bay into Link Road additional stress will be placed on the local roads, in particular Todman Avenue, Lenthall Street, O'Dea Avenue and Joynton Avenue.
- Their clients are concerned that a loss of business will occur due to the southbound right hand turn lane from South Dowling Street to Link Road being removed. This is both in the form of loss of trade to the public and in the form of loss in lease due to the lowering of property values.

1042. MARSH Will, Engineering Services (City of Botany Bay Council)

- The proposal for cyclists (bicycle paths) would have to change if a grade separated intersection is constructed for Mill Pond Road. The existing proposal results in cyclists having to leave Southern Cross Drive, south of Wentworth Avenue.
- In the topic "Future Transport Needs", the report states there is a need to service important zones of economic activity formed by Port Botany, Kingsford Smith Airport and central industrial area. It discusses an increase of freight, of passengers and employees of the Airport, but does not provide a solution or mention the improvement of the existing road system or a local improvement program for Botany Bay City Council as discussed for other Councils.
- In relation to Local Area Traffic Management (WP No.3 p 6.4, "Airport Motorway's proposal for local area traffic management is contained.....impacts put forward as part of the Local Area Improvement Program") for Botany Bay City Council, this could include traffic management measures such as implementing LATM devices in Robey Street after downgrading and redirecting traffic from local streets as a result of the additional traffic created by the new arrangements (M5 and Eastern Distributor).
- Working Paper No. 3 (p 6.5) states that the RTA is facilitating the formation of a number of consultative committees involving Sydney, South Sydney, Randwick and Woollahra

Councils, but does not mention City of Botany Bay (where the proposed Eastern Distributor ends and is critical).

- The potential heritage value of anything south of Cleveland Street has been ignored (EIS 9.5). The Botany LEP and heritage study are not even mentioned.
- For Section 10.5.2 of the EIS (Greenhouse Policy and Obligations) to be meaningful, it would have to list the ultimate goals that need to be achieved, what has been achieved so far, what will be achieved in the future and how this will be achieved.
- Section 10.5.3 (Climatic and Greenhouse Impacts) is inadequate and ignores the fact that there will be an increase in vehicle-kilometres travelled (vkt) which will have a negative impact on the greenhouse effect and on the use of non-renewable resources. The 0.04% is nowhere justified and not even described (0.04% of what? The total vkt in NSW?). The 0.01% increase in carbon dioxide emission is nowhere justified. The total vkt data and predictions should be included.
- In Section 10.8.5, it is unacceptable that there is no discussion of local air quality impacts adjacent to Southern Cross Drive. The claim that trends near Milroy Avenue are repeated for all of Southern Cross Drive is blatantly untrue. Position 14B shows emission increases of 29 to 55% for different parameters. Section 15 and 16 (Southern Cross Drive) show increases of 129 to 164% for the same parameters. The claim that levels would remain under EPA guidelines appear untrue for nitrogen dioxide and are not valid unless the background levels are added to the emission from the Eastern Distributor. These types of statements undermine the credibility of the whole EIS.
- Eastlakes residents will experience pollutant emission two and a half times current levels and this is of concern to Council. The claims about dilution with distance from the road are unsubstantiated. How have the results of the RTA's recent (unreleased) studies into this issue been used for these claims?
- With regard to traffic, the EIS concentrates north of Link Road and virtually ignores anything to the south.
- Problems associated with the M5-General Holmes Drive-Eastern Distributor section off the Sydney Orbital route have been totally ignored in the EIS, even though they have been outlined in previous meetings and in correspondence.
- The EIS avoids the issue of Mill Pond Road Drive with unacceptable comments, such as "the preferred freight route is Botany Road", and does not give the same assessment treatment for 6.4.9 and 6.4.10 as other sections. The EIS gives no assessment against factors and no justification for chosen options. Also, why does not Table 10.1 include the complex Mill Pond Drive intersections?
- The EIS states that the relevant LEP within Botany is Botany LEP 1995. Whilst this is true of the Southern Cross Drive carriageway and road reserve, it is not true of the majority of the land that the proposal passes through. The Lakes Golf Course and the

Eastlakes Golf Course are "deferred areas" under BLEP 1995 and are actually still reserved under the County of Cumberland Planning Scheme Ordinance.

- The Flora and Fauna section of the EIS (10.3) is inadequate. Sweeping broad-brush statements are made which have little or no background in fact. No attempt has been made to analyse the situation and form a result derived from a balanced consideration.
- In Section 10.8.4 (Emissions During Operation), Tables 10.9 and 10.10 show under the heading "Roadway Section" positions A to F and refer to Figure 9.1 A to C. These figures do not mention position A to F and one can only conclude that these positions refer to the average delays for different levels of service outlined on pages 9.5 and 9.6. However, this is not stated.
- No consideration has been given to initiatives and works that the RTA is currently actioning, including the advanced proposal to construct a main route carrier using the Bourke Road/O'Riordan Street one-way twin and thus the downgrading of Botany Road and the use of this route as the non-toll route for the Eastern Distributor. (RTA contact Gordon Chivers.)
- No consideration has been given to initiatives and works that the RTA is currently actioning, including the undertaking the RTA has with toll operators that the Sydney Orbital will carry more vehicles, especially freight vehicles, and provide for better access to the Sydney Orbital.
- The EIS only considers north-south movements, without considering the east-west movements that will occur due to the M5 extension.
- No consideration has been given to the City South Project's Freight Movement Study, which is being conducted by the Department of Urban Affairs and Planning. This study identifies key issues for environmental and economic improvements to freight movements for the City South area.
- Why are there no construction noise objectives for Vernon Avenue and Eastlakes School (EIS Table 9.8)? Botany Primary School is a much less relevant site.
- Why are the daytime construction noise objectives south of Link Road consistently higher than those to the north? It is assumed from the ambiguous presentation of this section (EIS 9.8.4) that there will be NO night-time noise south of Link Road. Is this correct? If not, the treatment is totally inadequate.
- The intersection at Mill Pond Road Drive is under strain. Freight vehicles turning east from Foreshore Drive have to use Mill Pond Road Drive to get access to Southern Cross Drive or Botany Road. Freight vehicles travelling south on General Holmes Drive from O'Riordan Street use Mill Pond Drive to cross Botany Road.
- Botany Road is currently a major freight route which travels through the Mill Pond Drive area. Freight traffic travelling to the west along Wentworth Avenue are forced to use Mill Pond Road to get onto General Holmes Drive and then on to the Sydney Orbital. All

these freight movements have to compete with passenger vehicle movements, particularly those to the Airport from Southern Cross Drive and vice versa.

- The EIS accepts that Botany Road is the preferred major freight route and yet predicts an increase into the area (see 5.2) of 4,700 trips/h from the Airport; 2,000 to 3,000 vehicular movements from Port Botany; and 2,650 vehicles/h from the central industrial area by the Year 2011. If freight movements are not removed from Mill Pond Drive, and irrespective of what was completed under MPR2 at 6.4.10, Mill Pond Drive will be unworkable during some hours of the day under this scenario.
- Consideration should be given now to creating grade separation at Foreshore Drive and General Holmes Drive, so that freight travelling east and north can quickly get onto Southern Cross Drive and avoid Mill Pond Drive. Suggestions are: construct a slip road from Wentworth Avenue to Southern Cross Drive so that vehicles travelling west along Wentworth Avenue do not have to go through Mill Pond Road to get to General Holmes Drive; downgrade Botany Road so that freight traffic uses Foreshore Drive and the Sydney Orbital rather than going through the Mill Pond Drive Area.
- If this freight traffic is taken away, perhaps Mill Pond Drive will be able to cope with the increased airport traffic that will be carried to and from Southern Cross Drive in the Year 2011.
- The EIS avoids the issue of Mill Pond Road Drive with unacceptable comments, such as "the preferred freight route is Botany Road", and does not give the same assessment treatment for 6.4.9 and 6.4.10 as other sections. The EIS gives no assessment against factors and no justification for chosen options. Also, why does not Table 10.1 include the complex Mill Pond Drive intersections?
- With regard to airport traffic to and from Southern Cross Drive, the proposal states that work predominantly involves remarking of traffic lanes (WP No. 3, p 7-1). Further details are provided in the EIS (7.1.8, p 7-10), where it is stated that the existing "seagull" island in General Holmes Drive be removed and pavement marking to suit new arrangements. This proposal is unacceptable due to the fact that if no serious improvements occur at this intersection, a bottle-neck will be created at Mill Pond Road which will leave an impact on travel times.
- No consideration has been given to the initiatives and works that the RTA is currently actioning, including the improvement of Mill Pond Drive and associated problems (RTA contact Peter Steele, Angelo Arul, Robert Chau).
- The fact that a barrier is already in place (on Southern Cross Drive) does not remove the severance effect caused by an increase in the size of the barrier, nor does it mean that additional noise generated by that project is less problematic.
- The EIS states that Mascot and Eastlakes are mostly "fully developed and there are minimal redevelopment opportunities" and that "Southern Cross Drive is already a significant barrier and that the widening of Southern Cross Drive within the existing reservation would not have an impact on those communities in terms of severance". There

needs to be an assessment of the likely noise affection for these properties, given the cumulative effect of aircraft noise and increased traffic noise.

- The noise mitigation measures are general and non-committal in the extreme. How will the community consultation be done? What alternative construction methods? What traffic noise mitigation? What are "all possible measures" for night-time noise?
- The alternate MPR3 option (for Mill Pond Road)(p 6-27 EIS), which is a provision of a grade separated access from Southern Cross Drive to General Holmes Drive appears the ideal solution. The statement in the EIS that this option was not considered due to construction works with substantial impacts on the operation of the Airport is not convincing. FAC appears to favour the grade separated option and has engaged consultants to provide comments. The grade separated access would also "tie" well with the M5 approval.
- The report identifies possible ecological impacts on the Botany Wetlands during the construction phase through sediment and contaminated water discharge. The EIS states that measures will be implemented during the construction process to prevent such discharges. Why this disparity?
- The EIS states that although the drainage patterns into the Botany Wetlands may alter, improvements to the existing system will lead to improvements in water quality discharging into the wetlands. What are the improvements to the existing system?
- There is very scant and inadequate reference to known patches of remnant native vegetation in the Botany Wetlands area, and affects on rare and migratory bird life and aquatic species. Increased traffic noise, bird strikes and reduced water quality runoff from the road could have impacts on vegetation, bird communities, seed distribution by birds and aquatic species.
- In Section 6.4.1 of the EIS, the factors in Table 6.1 ignore ecological impacts in the wetlands and ongoing water quality impacts through reduced quality of water runoff.
- The extent of the work done to investigate threatened species appears inadequate. What is being proposed about the bush stone-curlew and the regent honeyeater? (EIS 9.7.)
- With regard to Botany Wetlands, what water quality control measures will be put in place and where? On what basis is it "expected" that additional impacts will be minimal? Botany Bay City Council and Sydney Water deserve some mention in the consideration of water quality control measures near the wetlands. There should be consideration of full treatment to remove sediment, oil, grease, etc (not just trash racks, which will probably prove useless for a freeway carriageway) from road runoff prior to going into the wetland ponds. This is the sort of thing that could give some credibility to the RTA's claim that it is committed to the ESD.
- With regard to Water Quality Impacts and Mitigation (EIS Section 9.6.3), water contained by bunds in compounds should be treated/disposed of appropriately.

- There has been no mention of any significant trees south of Epsom Road.
- Botany has been identified as a soil disposal area during construction. This is not acceptable.
- (EIS 9.10) If soil and rock is not contaminated, it should be used as clean fill rather than disposed of in landfill. A testing regime should be in place to assess contamination status.
- What noise monitoring measures will be in place to ensure that the objectives are being met? How will the community get ready and immediate access to such monitoring results?
- No thought has been given in the EIS on how the Eastern Distributor will link with the M5. The M5 EIS is actively encouraging freight traffic to use its section of the Sydney Orbital to the extent that it is justifying the use of the tunnel section for dangerous goods. The Eastern Distributor EIS appears to be actively discouraging the use of freight. The Eastern Distributor is part of the Sydney Orbital route and should be part of the major transport lines and therefore should be brought into the same line of thinking as that of the M5.
- Freight movements, such as from Port Botany/Banksmeadow and how they can be improved by the Sydney Orbital, should be considered rather than giving them no consideration at all.

1043. GOLDBERG Dr John J

- During the period when people are awake, an increased annoyance reaction to traffic noise is possible from changes in the noise environment which expose people to higher levels than they are accustomed to through long exposure. Local examples are the F3 and the Kingsford-Smith Airport when the third runway was commissioned. The lack of evidence world-wide for adaptation to noise is not mentioned in the EIS nor how the noise impact would affect residents along the Eastern Distributor project, through their inability to adapt to changes in their noise environment.
- In visual and environmental terms the Distributor demonstrates the adverse effects created by the introduction of the country highway concept into an established urban environment.
- The tolled traffic volumes have been inflated by using the same expansion factor, which converts the two hour AM peak volumes to average annual daily traffic volume, seven days a week. There is unlikely to be the same traffic pattern on weekends and holidays which would justify this approach.
- Energy consumption during operation should have been addressed using vehicle-km rather than travel time saved. This measures the force in terms of installed thrust and distance travelled. Vehicle-km travelled will increase as more road space is provided, whereas traffic induced into the network will erode travel time savings due to congestion. The EIS argument, based on travel time savings, does not objectively address the requirement of

section 82 (2)(n) of the regulation to consider "any increased demands on resources (natural or otherwise) that are, or are likely to become in short supply".

- Fuel savings are more likely to come about by the year 2011 due to the scarcity of the commodity which may be sought by reduced number of vehicles, the price of the commodity and the need for conservation.
- Deficiencies in the EIS may render it invalid under Part V of the EPAA and Regulations. DUAP should not approve the proposal due to deficiencies. It is not enough to depend on administrative correctness of an EIS if its content is deficient.
- The Distributor should be reviewed in light of the 1981 findings of the Kirby Inquiry into the Kyeemagh-Chullora Road (three Quotes.). Using the Inquiry's principles, the main problems are the junction of five road segments at Taylor Square and the conditions at William Street. The Cahill Expressway should be linked underground to South Dowling Street to bypass these local areas. This should be costed and funded by State Government. This would eliminate the need for elaborate loss-making financial arrangement put into place by the private sector which may need Government support.
- Major bypasses are of limited value moving traffic to the next bottleneck. The tollroad will divert traffic unwilling to pay the toll to local streets.
- For a society to afford the Eastern Distributor it must be demonstrated that the income per annum from tolls levied on traffic must always exceed the debts incurred from construction, operation, management and payment of rent for the land on which the road is built. The existence of tollroad suggests that the Government does not have the money to pay for the "Sydney Orbital" plan. The RTA can only justify these roads by selective use of economics. Private developers need to demonstrate how financial arrangements can ensure profitability.
- Failure to address the matter of affordability/financial viability of the project, defined as one of the objectives in the EIS at page 1-10 is a serious omission. Omission of information should not materially mislead.
- The EIS can not address whether the project satisfies the Principles of Ecological Sustainable Development. ESD is defined in the EIS (page 1-14). As the project will be non-affordable, no surplus can be created to help maintain the environment in the future under ESD. Inserting high capacity road infrastructure into an existing network ensures that the road is an investment in future congestion because of induced traffic.
- The EIS does not provide enough information to assess the affordability. The prospectus for the Infrastructure Trust of Australia Group provides the essential financial data for the Distributor but is silent on traffic projections. This needs to be explained.
- Using Prospectus information and the EIS tolled traffic volumes the submission assesses that the road is non-viable.

- Quotes Table 10-2 (page 10-30) and Figure 5.7a of the EIS. (Heavy vehicles are taken to comprise 5% of the AADT.) Assumptions of affordability are based on:
 - ⇒ The relatively small traffic diversion factor of 18% derived from Table 1 is accepted to favour the development, even though it appears to be rather low as tolls in the year 2011 are likely to be doubled to those in 1994.
 - ⇒ There is high demand case given in Table 5-7 of the EIS which is said to reflect uncertainty in the traffic forecasts. The AADT volume inflates the count and is a generous estimate. The mean represents of a car count of 26 430 and a heavy vehicle count of 1917 AADT. In the Prospectus it is stated that the traffic volume on the Eastern Distributor will be nearly 60 000 vehicles by the year 2006. This claim exceeded the volumes for the "high demand case " in the EIS forecasts.
 - ⇒ The same AADT traffic volumes at 2011 are assumed to exist over the full concession period of 38 years. This assumption overestimates the toll revenue prior to the year 2011 and not significantly underestimates the revenue for the remainder of the concession period which would end about the year 2038 because of the oil crisis.
 - ⇒ The traffic expansion factor of 13/1.8 is accepted although it produces overoptimistic AADT volumes in the concession period.
 - ⇒ The toll for cars and trucks is assumed to be double that specified for the start of the operation.
 - ⇒ Interest repayments only apply to bank debt and CPI/AWE bonds.
 - ⇒ The only depreciation amount applied over 38 years is the construction debt.
 - ⇒ The rent to the RTA for the lease of the land is neglected to favour the promoters and investors. The calculation of NPV is at a discount rate of 10%.
 - ⇒ Investors will return \$16m per annum tax free and over the nominated construction period the \$48m paid in interest will reduce the equity base by this amount. Amortisation of this reduced amount has been ignored. This assumptions will produce conservative values returning the best possible overall outcome for promoters and investors.
- The EIS does not state the tolls for heavy vehicles and cars. Goldberg considers by 2011 that the approximate toll for cars would be \$4.00 and for heavy vehicles \$8.00, based on 4%. Total annual revenue is calculated to be \$58.6m (average). The rate at which diversion is likely to increase with escalating tolls is not stated in the EIS. The expansion factor mentioned at footnote 2 to Table 5-7 of the EIS, namely 13/1.8 may not apply on weekends and holidays where there is no similar peak period but the assumption made is that it does not apply. The EIS avoids discussion of the effect of the oil crisis on traffic volumes.

- The debt is analysed. Included is a graph where the annual state of profit and loss (assumptions included in the submission). There is a net loss of \$40m for the low demand case. The medium demand case produces a toll revenue of \$58.6m, but the increment in revenue over the "low demand" case even if realised does not reduce the annual cost sufficiently to make the project viable.
- The NPV of the income and losses with and without amortisation (excluding equity base) over 38 years is shown in a figure in the submission. NPV of the deficit is \$430m, if amortisation is included and \$270m if amortisation is ignored.
- For the M2 the A.G. stated that a debt from leasing land "is deferrable and is subordinated". Under financial circumstances of future loss of the Eastern Distributor it is unlikely to ever be paid and is ignored.
- As a private venture the Distributor is shown to be not financially viable on the most favourable measures of income and debt and measures of potential acceptance as defined by economic authorities.
- Only by reducing debt obligations through drastic reduction of interest payment rates to investors of major accounts, eg investors in infrastructure bonds, would the decision rule for acceptance in normal economic terms be satisfied.
- Normal accounting methods could not assure investors of an adequate distribution in excess of the indicative interest/discount rate of the debt of 10%. If infrastructure bond rates are reduced to \$14.9m per annum instead of \$40m, over the life of the project, then the decision rule for economic acceptance is just satisfied for the low traffic demand. The corresponding internal rate of return on these bonds is reduced to 3.7% per annum. A higher rate of return would be obtained if the medium demand case is accepted as the best compromise. But the internal rate of return would still fall below the indicative discount rate of 10% for infrastructure bond investors who have subscribed \$400m.
- Sleep disturbance is determined by maximum noise levels, the amount by which these levels exceed the ambient as well as the ambient itself. Limits have been placed on these relevant quantities based on international experience to ensure that only 10% of persons exposed between the age of 5 to 75 years will be awakened. The 10% is adopted by the EPA. Failure by the RTA to endorse the above results which are referenced in the EIS but not used, appears to show that the RTA requires its consultants to provide a predetermined outcome on noise control ineffective against heavy vehicle noise at night. The EPA by its use of TNL recognises the importance of heavy vehicle noise at night. EPA sets TNL = 55 dB(A) to achieve its 10% rule. How can the position of the RTA be reconciled with that of the EPA as asserted in the EIS (page 11-10)? It is doubtful whether "ongoing monitoring and policing of speed restrictions" (page 3-6 EIS) will really result in any substantive amelioration of noise impact on residents.
- The EPA recognises the noise problem created by heavy vehicles at night, requiring not more than 1 in 10 persons exposed to suffer sleep disturbance. The RTA through its Interim traffic Noise Policy ignores the problem.

- Noise barrier designs developed to satisfy RTA criteria are ineffective in the presence of heavy vehicles at night.
- The RTA's Interim Traffic Noise Policy of the RTA (10-81) does not enable proper evaluation of the impact of traffic noise, particularly from heavy vehicles at night. Averages have no regard to heavy modulation of sound which occurs from the passage of heavy vehicles. At night the modulation is greatest because the maximum noise levels are high and the ambient sound level is at its lowest from the attenuated numbers of motor vehicles in the traffic stream, particularly cars. The key property of traffic noise levels is a major factor in disturbance to residents. It is not addressed by averaging measures used by the RTA which tend to disguise the matter. Noise attenuation is based on averaging measures. This has resulted in ineffectual noise control of heavy vehicles at night.
- The RTA's policy measures noises level which occur during a nominal 16 hour "awake" period and a nominal 8 hour "asleep" period. During the 19 hour period people may experience annoyance, whereas during the 8 hour period they may experience sleep disturbance.
- The claim of the RTA that the LA_{eq} (8 hour) noise level objective of 55 dB(A) measured externally at a house facade between 2200-0600 hours is similar to European countries is rejected. These countries, although using averaging measures, specify a limit to the internal noise level which means that the architectural properties of a house must satisfactorily attenuate the noise. The RTA does not account of building structure developed for Australian climatic conditions.
- The changes in ambient level quoted at Woolloomooloo in Table 10-15 should not be interpreted too literally as the main traffic stream predominantly from cars may set the average level. A 3 dB(A) increment in a single noise event is just discernible but when applied to the average measure LA_{eq} over 8 hours or 24 hours the real effect is disguised. Large increases in noise from heavy vehicles may produce awakenings. Yet the average increase in LA_{eq} terms over 24 hours may be less than 3 dB(A). Decreases in LA_{eq} may not represent improvements in the noise regime because large modulation depths from relatively few heavy vehicles control the noise impact at night.
- In Table 10-14 "Existing + 3" is the traffic noise objective quoted, which allows the RTA to do nothing about traffic noise in an urban environment. "Existing + 12" allows the RTA to increase the existing ambient by an even larger amount in a quieter environment. These ambient levels are inappropriate because modulation of sound is ignored.
- The traffic noise problem can not be properly addressed in the EIS because the RTA's policy has been shown to include misrepresentations of results in archival literature. It therefore lacks scientific integrity.
- The economic analysis used by Australian road authorities deals only with road user benefits in terms of travel time savings, vehicle accident costs, vehicle operating costs and construction cost. This analysis does not concern the financial viability of a project or the external cost of transport such as congestion and environmental degradation.

- On page 5-59 of the EIS the BCR is given as 2.3 at discount rate. The methodology to obtain this value is said to be based on the NSW Government Guidelines. (Annex 3 of these guidelines is an economic analysis of the Gore Hill Freeway.) The adoption of this methodology by NSW Treasury does not take into account other factors such as congestion from induced traffic and noise. Treasury should review this matter.
- The SACTRA report recognises that new roadworks induces traffic. These findings were recognised two years ago and should be considered in the Eastern Distributor project. Failure to consider the phenomenon causes an overestimation of travel time savings, which account for 80% of the road user benefits. Reference should be made to Vol 12 of the 1981 Kirby Inquiry into the Kyeemagh-Chullora Road where induced traffic is discussed.
- Conventional cost-benefit analysis produces large value benefit to cost ratio. An increase in costs would occur through the provision of proposed noise attenuation and would allow the road-user benefits to exceed the costs. Equity has not been dealt with on page 3-4. The equity issue mentioned in the EIS such as retention of fig trees in Moore Park, heritage, noise and vibration are mentioned as unresolved.
- Travel time savings used in the calculation of the BCR are based on the cost of leisure through having to drive to work, a form of disrupted activity. Standard wage rates could also be applied to evaluate the economic cost of noise where sleep is disrupted by noise (Reference Gross). The cost of sleep disturbance is quantifiable and large.
- The "Sydney Orbital" road plan does not constitute a truly circumferential road system. The two main radial road system segments aimed at the CBD will help to induce more traffic at peak periods onto an already congested road system. The failure of the RTA to recognise the problem of induced traffic means that it can not implement its publicly stated policy of moderating demand for new road space.

1044. MURPHY Peter (Surry Hills Social Justice Coalition)

- The noise impact on houses fronting South Dowling Street is bad now and would be unliveable with the tollway. Residents must not be faced with concrete noise barriers outside their doors, nor should they be forced to double glaze and insulate. The number of residents facing South Dowling Street continues to increase with the conversion of former industrial sites at the southern end to residential use.
- The Eastern Distributor proposal is a massive imposition on the people of South Sydney. Traffic benefits that may occur at Taylor Square and Flinders Street are far outweighed by other impacts.
- A proposed tunnel under Taylor Square has had widespread support in South Sydney but the EIS is a tollway from the Sydney Harbour Tunnel, to the Airport, "grand road scheme" that crushes Woolloomooloo, Darlinghurst, Surry Hills, Kensington and Zetland, and appears to defeat the purpose of the rail link.

- The EIS states that the project will be cost free to the government and paid for by a toll. This is at best a half truth because the people of NSW are donating all of South Dowling Street and the right to toll to the private company in exchange for tunnelling works. The government has again broken its promise regarding tolls.
- Feels that the widening of South Dowling Street and transforming it into a freeway will make it virtually impossible for residents in Surry Hills to reach Moore Park by foot or by bicycle. The Coalition feels that this is one of the worst aspects of the proposal and it is totally unacceptable.
- Coalition wants the tunnel to go all the way under South Dowling Street. This long tunnel would have significant safety problems, and where would the exhaust fumes be expelled?
- In Woolloomooloo the suburb will be cut in two at Palmer Street which will take a slice off the neighbourhood.
- Planners must find an alternative to turning South Dowling Street and Palmer Street into speedways in the heart of inner Sydney.
- Protection of local streets and secondary routes by Local Area Management Schemes is vital if the community is not to suffer seriously from the impacts of the tollway.
- The elevated toll plaza is a completely wrong concept for this area of Sydney, where The Domain should be reconnected and the Cahill Expressway covered over. Car fumes at the proposed toll plaza would also have a serious air pollution impact on the Art Gallery.
- The toll plaza must not be allowed to massively intrude on this area of Sydney, nor should any more housing in Woolloomooloo be destroyed to make space for it.
- Take the toll plaza out of there.
- The EIS does not take into account the extra traffic that will be generated by the huge parking and entertainment uses proposed by Fox Studios, as well as the existing heavy east/west pedestrian, and car traffic generated by football and concerts.
- When Sydney's other tollways opened, there was a rapid increase in the number of cars, including on the access roads, as well as on streets used to dodge the toll.
- Through traffic is already heavy on these roads, and on narrow streets like Devonshire Street and Riley Street. Oxford Street and William Street would also become alternative routes to the bridge.
- Unless protective measures are taken first, local streets will take a very heavy impact, especially from northbound toll dodgers. The obvious routes are Bourke Road, Baptist Street, Cleveland Street and Crown Street; or Botany Road, Regent Street, George Street, Hay Street, Goulburn Street and Liverpool Street. To reach the Bridge without paying the toll, drivers will have to head for the Western Distributor or Macquarie Street.

- The Coalition has been concerned about:
 - traffic calming;
 - keeping through traffic off residential streets;
 - improved public transport, bikeways and pedestrian paths;
 - reduced air and noise pollution;
 - adequate parking for residents.

**1045. HANNING Peter, Director Technical Services
(Woollahra Municipal Council)**

- The Working Party notes that exit ramps have been provided in Moore Park Road and Anzac Parade but the entry ramp for all north-bound traffic is located in the Drivers Triangle between Fitzroy, Flinders and South Dowling Streets, meaning the congestion at the Drivers Triangle will continue.
- The Committee's preferred option would be Option DT3, with the northbound entries to the tunnel relocated from the parkland in Drivers Triangle to individual entries on both Moore Park Road and Anzac Parade, facilitating improved flow into the Distributor and improved pedestrian safety at this intersection.
- Council urgently seeks a local area traffic management scheme to be undertaken in certain areas so as to overcome regional traffic problems arising out of the construction of the Eastern Distributor.
- The Committee (Working Party) believes that the downgrading of the exit land behind the Art Gallery in Sir John Young Crescent should be no less than two travelling lanes. The current proposal indicates one lane, which will not be sufficient to handle the volume of traffic wanting to exit Sir John Young Crescent.
- Bus-only lanes in Oxford Street, between Centennial Square and Taylor Square, should be investigated now that the Eastern Distributor is to be constructed.
- The Committee believes that the tunnel should be made up of three lanes in either direction and fully undergrounded to O'Dea Avenue.
- Woollahra Council has set up a working party to address details relating to the possible impact of the Eastern Distributor on various streets throughout the Municipality. The Working Party looks forward to working with officers of the RTA and an appointed consultant to address a local area improvement programme for specific areas within the Municipality.
- The RTA should be taking a longer term view of the proposal and not simply be building a distributor to accommodate traffic related to the forthcoming Olympic Games.

- The Committee looks forward to a thorough analysis of the Woollahra/Paddington area, involving an origin destination survey to provide both Council and the RTA with data on the real magnitude of through traffic and its likely increase.
- The Committee (Working Party) stresses that the preferred route for eastern suburbs' commuters is either York Road or the Syd Einfeld Drive onto Oxford Street, to the Centennial Square intersection, then onto Moore Park Road to access the proposed Eastern Distributor.
- Committee seeks the downgrading of Ocean Street from a regional road to a local road, and Oxford Street between Centennial Square and Taylor Square, from a state road to a regional road, with the removal of the clearway restrictions from this area.
- One lane (rather than two right-hand lanes) turning into Ocean Street from Oxford Street at the beginning of Syd Einfeld Drive would be appropriate if increased vehicle flow could be accommodated at the Drivers Triangle from Moore Park Road.

1046. WINLAW Russell, Strategic Planning Manager (Liverpool City Council)

- Concerned that the EIS for the Eastern Distributor must take more account of the role of the M5 and its interaction with Sydney's second major airport.
- Has stated that the EIS fails to take into account the fact that there will be significant increase in the numbers of private vehicle owners from the south-west who will go to and from employment in Eastern Sydney making use of the combined M5/M5 East and the Eastern Distributor.
- Liverpool City Council believes that not enough attention has been given to the importance of the Eastern Distributor in accessing major employment zones and the role that is played by the major arterial roadways from Sydney's south-west that feed onto and will impact on the Distributor.
- The area of specific concern is the tunnel on General Holmes Drive. This consideration is not included in the EIS for the Eastern Distributor, however, the results of accidents will directly impact the effective functioning of the Eastern Distributor.
- The RTA should review the practicality of connecting the proposed "Campbell Street Terminus" of the M5 with the Eastern Distributor in South Dowling Street. A scheme to achieve this is shown in the map from the Department of Planning's "New Southern Railway" document. An investigation be undertaken into splitting the traffic at the eastern terminus of the M5 into two components and which will require the use of the General Holmes/Southern Cross Drives.
- Regarding Sydney's second major airport which is to be located at Badgerys Creek or Holsworthy, both of which will be serviced by the M5. In the EIS traffic projections this has not been accounted for and it has significant implications for potential traffic flows on the Eastern Distributor/M5. The validity of the EIS's traffic projections is questioned by

the following comments: "Consideration was also given to a number of other proposals and their likely impacts relative to the proposed Eastern Distributor. M5 East - the inclusion of the M5 East is expected to have a limited effect on the Eastern Distributor".

- The Council has raised concerns about the adequacy of the southern section of the Eastern Distributor between Mill Pond Drive and South Dowling Street to cater for the traffic volumes arriving from or departing to General Holmes Drive.

1047. ANONYMOUS (TAG, NCC)

- The effects of the proposal on Crown Street are difficult to judge (including reverse high and low demand effects). Conversion of Crown Street, north of Oxford Street, to two-way operation is the only local traffic management proposal the RTA has made. It will squeeze north flowing traffic onto the Eastern Distributor as much as possible to maximise toll revenue, but Crown Street would be the only north-flowing artery through Surry Hills and as such would receive a lot of toll avoiding traffic.
- It is noted that in the "high demand" case, the RTA expects traffic to fall by 37% on Crown Street if the Eastern Distributor was constructed and 30% if it was not. This is curious because on the face of it, improving the amenity of Crown Street is the RTA's only strong selling point for the proposal. If the RTA really believes traffic will fall by 30% over the next few years if the Eastern Distributor was not built, why is it going to all this trouble for a 7% gain?
- There is blind assertion, not analysis that the Eastern Distributor will improve access to areas proposed for urban/economic renewal in the city's south region irrespective of urban form. Many of these areas are urban villages where traffic is deleterious and where access by public transport is crucial.
- Given the record of the RTA, it is doubtful whether its "ongoing monitoring and policing of agreed restrictions" (p 3-6) will result in substantive improvement in resident's amenity.
- Limitations on the effectiveness of noise barriers have been largely ignored. For example, the noise working paper, at page 28, giving the reader an over-optimistic view of barrier effectiveness. Noise barrier effectiveness is not only determined by barrier heights that cut off direct line of sight but also may be markedly reduced by reflections from buildings and from the surfaces of large heavy vehicles.
- In WP Table 4-2, noise levels at building facades are given. This reveals the composition of traffic in terms of average number of heavy vehicles per hour passing this location, which includes Kidmans Terrace. The present noise level would be the result of 20 heavy vehicles per hour added to the existing car traffic. At present, about 26% of residents on average would suffer sleep disturbance. With the Eastern Distributor in operation, this percentage would rise between 33 to 43%. This unacceptable increase would be caused by the rise in heavy vehicle volumes to about 50 per hour.

- This intrusion of heavy vehicles through residential streets with its severe consequences is evaded in the EIS economic analysis (page 5-58). This analysis succeeds in providing numbers which are derived by excluding those affected by noise from the definition of "community". Although the RTA's "traditional" method of calculating BCR for road projects uses an hourly wage rate for calculating travel time savings, it does not factor in a disbenefit amount in terms of hourly wage rates for disturbed sleep. A substantial number of roads in the Sydney Region would be unjustifiable economical if the RTA had properly included the cost of noise.
- The EIS is deficient in its treatment of areas raised in air guidelines. Comments are based on the air quality section pages 10-56 to 10-77 and Figures 9.1a, 9.1b and 9.1c.
- (DUAP Page 1.) Consideration of alternatives. The air quality component of the EIS does not adequately develop an observation regarding the important alternatives from air quality viewpoint - these being alternative fuel of vehicle strategies. It takes as an assumption our current fuel and vehicle usage and proceeds to present 15 year projections on this basis. This approach fails to contemplate the inevitable changes in both fuels and vehicles which can be expected over that period. The EIS fails to adequately deal with a key requirement of the guidelines and fails the test of fair and reasonable public expectation.

Page 1: Opportunities for the facilitation of public transport. The EIS fails to address the requirement of the guidelines in relation to air quality issues. This is a major shortcoming because a variety of public transport modes can be presented which offer significant air quality advantages (on a per capita basis) over the geometric growth "business as usual" model included in the EIS. Once again the document fails to satisfy the prescribed guidelines, and also fails to meet fair and reasonable expectations.

Page 2: Changes in air quality impacts. The EIS fails to adequately deal with likely changes in air quality impacts.

Page 2: Potential cumulative impacts. The EIS does not take any inductive traffic growth effect into account and therefore fails the requirement of the guidelines.

- If the guidelines summarised in the three specification documents had been conformed to, then the RTA would have had a reasonable definition of environmental risk and exposure. The EIS has not been prepared in a manner consistent with the Guidelines.
- Pages 10-57&58: Basis of deriving nitrogen concentrations from total oxides of nitrogen. The document presents data which identifies "conversion rates" of up to 44% and averaging 23%, for estimating nitrogen dioxides from total oxides of nitrogen. It then uses conversions of 20%, 10% and 7%. These lower figures underestimate the likely levels of NO₂ which will emerge, then it runs a very serious risk of understating one of the critical air pollutant levels involved. Sydney has an acknowledged NO₂ problem and where the average conversion figure of 23% has been taken, then many of the projections which just met air quality standards would have failed to meet these standards. The conversion rates are artificially/optimistically low then the high NO₂ projections, which have been posted, should be presented as unacceptable levels consistently above NHMRC, WHO and USEPA criteria.

- Page 10-61: Particulate matter PM₁₀. This issue is dealt with superficially and inadequately. The critical role of PM₁₀ particles in introducing adsorbed PAH material into the human respiratory system is not addressed. This function is critical in the air pollution/human health equation and a contemporary consideration of the role of PM₁₀ without adequate consideration of the issue would appear to be well below expected technical standards.
- Page 10-63: Hydrocarbons. This paragraph states that "hydrocarbons alone do not generally pose a problem in the environment". This fails to recognise the known toxic and carcinogenic roles of a number of common hydrocarbon air pollutants such as benzene, toluene, formaldehyde, 1-3, butadiene. It is stated that "These effects however are thought to occur at levels much higher than the levels of exposure found at roadsides from traffic emissions". This is inconsistent with current international opinion and regulation. It is appropriate to ask "thought by who?" because the opinion expressed is inconsistent with current positions of the USEPA, UK Department of the Environment and Europe WHO. It reflects the current Australian Petroleum Institute's position. A balanced position should have been presented.
- Page 10-67: Projected Year 2011 Pollutant concentrations. The NHMRC NO₂ limit of 328 micrograms/cubic metre (1 hour maximum) has been established in Table 10-8; Page 10-60. The data presented on page 10-67 does not include background which is high and has been based on very optimistic assumptions (regarding conversion factors). If backgrounds are added in and more conservative conversion estimated, many of these NO₂ projections would not conform with the established air quality limit.
- Page 10-69: Hydrocarbons, benzene. References figures in Tables 10-9 and 10-10. The data is not in those tables. It appears the numbers in relation to this air carcinogen have been "pulled out of the air".
- Page 10-71: Hydrocarbons, benzene. The analysis provided is trivial and misleading. It is not technically or scientifically appropriate to present a projection in relation to likely year 2011 benzene concentrations on this basis.
- Page 10-77: Policy matters to reduce emissions. The three options presented in the EIS is a disappointing summary and fails to adequately reflect the requirements of the specification guidelines. While encouraging public transport has merit, the overall consideration does not acknowledge the fundamental fact that there are two ways in which transport sourced air pollution can be reduced. These being: reduce the number of vehicles operating in the urban environment and change the nature of the fuel used. None of these mechanisms have been dealt with adequately.
- Impacts on air quality are only provided for 1996 traffic flows. Predictions are based on vkm travelled and emission rates estimated for different classes of road. If network re-congests at a higher level pollution impacts will be significantly worse.
- Specific requirements - Attachment 1

- Page 4: Proposed air quality monitoring. The requirements call for prediction and monitoring of air quality inside tunnels and methods and cost effectiveness of tunnel exhaust treatment. Neither issue has been adequately addressed and fails the requirements of the Guidelines.
- EPA has sought due consideration of air quality within tunnels and potential measures to treat tunnel exhausts. Neither issue has been adequately addressed in the EIS.
- Traffic forecast is not adequate, therefore informed judgements can not be made on the basis of the EIS.
- A number of parallel alternative routes to the ED are not discussed, particularly those passing through South Sydney and off the Western Distributor.
- Compares the traffic modelling for the 1994 M5 EIS, where it is considered the Eastern Distributor's EIS is a step backwards. The EIS provides only a modelled estimate of traffic for a very few streets of section of streets and only for 1996 and 2011. The medium travel demand figure has not been given. There is only high and low range with extreme range in between. This means that:
 - ⇒ the current rate of traffic growth is impossible to gauge. It is impossible to tell whether on a given street is increasing at 1,2 or 12% per annum;
 - ⇒ the sudden increase in traffic volume that usually occurs immediately after a motorway opens is concealed;
 - ⇒ with only two dates it is difficult to create a graph representing the rate of traffic increase after the road has opened;
 - ⇒ the EIS only presents a wide varying scenario, ranging from traffic on a given street falling by several thousand vehicles per day by the year 2011;
 - ⇒ it is impossible to model the average speed in the road network as a result of either building or not building the project (provides an example of network speed modelled in the M5 East EIS).
- The modelling used in the EIS is more misleading than if an estimate had been made on the basis of the rate at which traffic has historically increased in Sydney before and after the construction of comparable projects. The RTA prefers to keep analysis of such data confidential.
- Provides an outline in the submission of historical background to why they consider the RTA had provided a minimum data set. This includes their considered incidence of scientific fraud in the 1994 EIS for the M5 East and SMEC's review of these figures not being released. Provides a graph of how traffic growth rate was exaggerated in the M5 proposal. For the Eastern Distributor the RTA has supplied minimum information.

- Traffic forecasts for specific roads or sections of roads are unreliable and provide no basis for considered judgement of the impacts of the proposal or methods to mitigate the impacts. Two different computer models have been combined to produce the EIS figures. The traffic forecasts are based on the fixed demand methodology which was rejected by the SACTRA report.
- In some cases the volume of traffic on specific streets in the "low demand" case is several thousand vehicles per day higher than in the "high demand" case. Examples of this are Oxford Street (west of Taylor Square). Without the Eastern Distributor, in the low demand case, traffic is expected to rise by more than 9,000 vpd. In the high demand case its expected to fall by 3,000 vpd. Similarly, with the Eastern Distributor in place in the low demand case, it is expected to rise by 4,000 vpd. With high demand it is expected to fall by 8,000 vpd. This case is illustrated in a figure in the submission. Another example is Crown Street (between Devonshire Street and Foveaux Street). Without the Eastern Distributor, in the low demand case, traffic is projected to rise by 5,000 vpd. In the low demand case it is expected to fall by 5,000 vpd. If these are typographical errors, the EIS is completely misleading through simple error and should be withdrawn. If it is not typos then the traffic planning is the equivalent of "cold fusion fraud". This phenomena should have been discussed in detail of the "reversal effect". Suspicious that there is an attempt to manipulate the computer model to show the most attractive post-project scenario.
- The Eastern Distributor is a route from the Harbour Bridge to the airport, and the southern and south-western suburbs. There are more direct routes to the airport eg through the city, South Sydney and Newtown. These are alternative routes and have not been modelled, nor the effects on the routes of toll avoidance by north-flowing traffic have been discussed or described. Effects on the Eastern Suburbs: No attempt has been made to show where vehicles from Moore Park Road will go to the Eastern Distributor. Most of them will flow into Queen Street and onto Oxford Street, and then to other parts of the Eastern Suburbs. The several streets would suffer increases ranging from several hundred to several thousand vehicles per day.
- Effects on the south-eastern suburbs via Anzac Parade: The effects on Anzac Parade, the intersections and on the main streets feeding into Anzac Parade have not been discussed. Traffic on Anzac Parade would increase by 18% around 6,600 vpd. This would be felt at all intersections and feeder streets off Anzac Parade.
- Induced traffic on South Dowling Street: There will be a doubling of traffic along the existing route.
- Given that Rust PPK acknowledge that induced traffic is a highly complex issue, alternative traffic modelling scenarios with hypothetical rate of inducement (eg 10%) could have been developed. Rust should have provided "real-world" data pre and post M4 and M5 to shed light on this issue.
- The RTA argues that area along the above ground route of the proposal already suffers noise levels above the RTA's noise goal and therefore the RTA need only attempt to hold the increase above this level that it claims are not usually detectable. This is inequitable

and based on a principle which would be dangerous to establish as a precedent. It says that once an acceptable level has been exceeded further deterioration is acceptable.

- Some streets will benefit by declines in traffic noise levels. This is fallacious because lower traffic levels in the existing street system are an unlikely outcome of the proposal.
- The EIS should have specified how bad the noise will be in terms of the response of residents. Instead they take refuge in generalities and dispersion of information, a familiar technique used to obscure what the public needs to know.
- The EIS says that Bourke Street will be closed on the northern side of Oxford Street and elsewhere says that it will be closed on the southern side. There is predicted 2,200 vpd (13%) drop. This is unlikely because the tendency for traffic to rise to fill the road space available would apply to Bourke Street.
- The consideration of future fuel supplies (required component of EIS) amounts to a conscious evasion of a massive body of evidence from respected international consultants. The conclusion is that the world is on the brink of a permanent "oil shock". It is generally accepted, except by the RTA, that Australia's crude oil supply has peaked.
- Quotes the section of the EIS dealing with oil depletion (5.2.5) and responds with the following:
 - ⇒ The correct title of Petroconsultants report is "The World's Oil Supply 1930-2050". Professor Henscher's article was written three years before the Petroconsultant's report to which it is supposedly a response. It says nothing about oil depletion. There is debate in the oil industry as to exactly when the midpoint of oil depletion will occur. The authors of the World's Oil Supply 1930-2050, put the midpoint at about 2000 (Figure 6.1). More conservative estimates put it a decade later. Nobody seriously disputes the exponential decline in supplies will set in from midpoint, with massive shortages and price increases.
 - ⇒ The rate of consumption and the rate of discovery and production of petroleum products are very well known. There is no discussion of this.
 - ⇒ All oil industry analysts acknowledge that "the known pool of available supply" is shrinking rapidly and that there is no chance of expanding it. Gains in efficiency of consumption large enough to overcome exponential decline in supply are not in prospect (except in drastic cut in km travelled). All the evidence is that it is simply impossible to replace what is termed "conventional" oil with petroleum alternatives at a price which is not several times higher than the present day petroleum prices. The only exception is possibly compressed natural gas but the price of this fuel will necessarily rise as shortages of petroleum fuels increase.
 - ⇒ The nature of the Eastern Distributor would violate Government policy in relation to personal travel. It is a private tollway which, as a commercial venture, specifically relies on encouraging increased dependency on private vehicles.

- ⇒ The laws of biology and physics make it impossible for liquid or gas alternatives to fossil fuels to be significantly expanded in relation to the transport task.
 - ⇒ When motorists are paying more for petrol, then km travelled will decline. As vehicles decline, more direct, untolled routes will be used. The proposal does not support improvements to public transport and the mass replacement of petrol and diesel-powered cars by alternative fuelled vehicles is doubtful.
 - ⇒ Nobody suggest abandoning a road corridor but that there should not be an expanded capacity encouraging further increase in car dependency at the expense of electrically powered public transport (a bibliography on oil depletion is provided in the submission).
- Moore Park Road will be heavily impacted. It is the exit point for east-moving traffic coming of the Eastern Distributor. The EIS projects an increase from 19,700 to 30,400 vpd (54%). Most of this traffic will flow into Queen Street and onto Oxford Street, east of Queen Street. The RTA have avoided modelling these streets.
 - The RTA's claim that east-west traffic would vary little as a result of the Eastern Distributor should be treated sceptically. The figures for west of Taylor Square suffer from the mysterious "reversal" effect (low and high travel demand). Historical experience suggests that to the extent that the Taylor Square bottleneck is cleared by traffic diverting into the tunnel, east-west car traffic would increase, taking advantage of initially improved road conditions. The EIS gives no forecast for Oxford Street east of Queen Street - an important omission.
 - Traffic forecasts for Cleveland Street seem particularly unreliable and unlikely. It would be in the RTA's political interest to show no increase in east-west traffic as a result of the proposal and questions whether this result has been artificially obtained from the modelling process.
 - In the section 5.5 Proposal Justification, the proposal is justified in a macroeconomic sense where the EIS assumes the proposal would have a beneficial effect. Questions whether investment of this type and on this scale actually does assist economic growth and national competitiveness. Infrastructure is consumption, not production. It is input into production and can not be traded. Infrastructure reform means using less resources than previously used. The submission looks at overseas examples of infrastructure and GCP, where economic competitiveness of cities show that investment in comprehensive public transport systems rather than motorways leads to greater efficiency in production (see submission for more detail). Concludes that there are two microeconomic problems which infrastructure poses for the economy which are: 1. The opportunity cost to investment in productive output sector industries (do we spend money on building freeways or do we invest it in the development of import replacement and new export industries?); and 2. Higher operating costs to industries located in sprawling cities. Do we want a city where most of the workforce drives to work by cars on freeways leading to higher infrastructure costs, household costs and petroleum fuel costs or do we want to see most journeys to work undertaken by public transport, bicycle or walking, leading to lower costs? These two criteria need to be applied to the economic appraisal of the Eastern Distributor. Will

we consume more or less transport after it has been built. Freeway-based cities make their infrastructure sectors less efficient.

- The proposal is motivated by the need to increase tollable traffic on the private motorway system. The formal justification is based on arguments which are outdated or discredited such as the "fixed demand" methods of modelling traffic. The national economic interest and rational urban planning policy which require that car travel be cut and the ITA's need for maximum traffic volumes is incompatible.
- Justifications for building the Eastern Distributor are provided in the EIS. Comments are provided on the following justifications:
 - ⇒ The need for a more efficient transport link through the inner eastern suburbs has long been identified Sydney's metropolitan land use and transport strategies. The strategies do refer to the need for more efficient transport links but the Eastern Distributor is specifically a road link which will increase commuter road traffic when it needs to be discouraged and when high standard public transport alternatives are required.
 - ⇒ "Such a link would facilitate transport, commercial and freight movements to Sydney (Kingsford Smith) Airport, Port Botany and Central Industrial Area...." The existing road network is completely adequate for existing and future commercial and freight movements through the area. The problem is commuter car traffic. This needs to be actively discouraged as part of a Sydney-wide policy. As a privately owned tollway the proposal is specifically designed to encourage the largest increase in car-commuting possible.
 - ⇒ "The Eastern Distributor has been identified as an important part of a hierarchy of major roads servicing the northern, eastern and south-eastern area of Sydney. It would form an important part of Sydney's emerging orbital road network." This network is not orbital but the DMR's radial road plan.
 - ⇒ "In addition, it would provide high standard road access to Sydney airport....improve traffic flow during peak periods in the inner eastern suburbs...". Commuter traffic to the airport will be served by the NSR. Commuter road travel to the airport should not be encouraged. Improving peak traffic flows is the wrong policy. The outcome would be more traffic and higher congestion. Patronage of rail would suffer.
 - ⇒ "By placing significant north/south traffic flows within the tunnels between William Street and Moore Park, the Eastern Distributor would relieve heavily trafficked roads..."Traffic figures do not demonstrate relief but increased traffic. Traffic access through Sydney should not be facilitated.
 - ⇒ "Major opportunities to improve public transport would be created..." The opposite will occur. It will unfavourably change existing public transport arrangements. Money should be spent on public transport infrastructure. There will be a drop of patronage of rail.

- ⇒ "The Eastern Distributor would assist in improving the quality of life of many residents, pedestrians and cyclists who use residential streets which presently carry high volumes of traffic...". Improvements of quality of life will be limited to small areas and will be short term. Most residents will suffer.
 - ⇒ "The Distributor would support major planned redevelopment proposals in the area providing improved accessibility and removing planning uncertainty." Car access to major redevelopment projects should not be encouraged. Public transport should be encouraged. Planning uncertainty can only be removed by a major downgrading of the RTA's status, power and budget.
 - ⇒ "If the Eastern Distributor is not implemented the consequences to the traffic system of normal traffic growth would be longer travel times, spreading of peak periods into business hours, deterioration on public transport and poor safety and amenity on local streets". The whole experience of urban planning shows that all these effects actually result from building larger roads. Solution to switch funding from traffic generation measures to traffic reduction measures.
- The proposal is justified by using the weakness of the Metro Strategy, ITS and State Road Network Strategy. It ignores the strengths such as investing in public transport in key corridors. All benefits are based on traffic relocating from existing roads and none being induced to take its place. The Sydney Orbital road system is not a feature of SRNS, Metro Strategy or ITS.
 - It would set a dangerous precedent to proceed to a favourable determination of the proposal on the basis of misleading, incomplete and technically inadequate document.
 - The proposal runs counter to government policies and should be abandoned in favour of public transport infrastructure and traffic demand management.
 - No discussion provided on Olympic planning.
 - Alternatives to manage environmental impacts have been detailed but not considered.
 - Page 10-25 asserts construction of the M5 East will have limited effect on the Eastern Distributor. The M5 East would provide a link between two major motorways, both with massive traffic flows. The result would be extension of motorway conditions from the city to Campbelltown. This could lead to massive increase in traffic on the Eastern Distributor with massively different impacts on air, noise and congestion. A scenario for increased traffic based on M5 East should have been modelled.
 - Issues of oil supply depletion and induced traffic are not listed as community concerns with consultations with Transport Action Group.
 - Traffic on South Dowling Street will increase from 48,500 to 125,500 vpd, an increase of 258% by 2011. Most of this increase will occur three years after the Eastern Distributor becomes fully operational. This will increase air, noise and visual pollution in this heritage area.

- Considers the economic viability of the NSR would be affected. NSR would lose airport-city patronage commensurate to additional road vehicle trips to the airport. Many people who would otherwise take the train will chose to go by private vehicle or taxi.
- There is no analysis of the potential of the Eastern Distributor to compete with the NSR. The assertion of the EIS flies in the face of logic ie if the Eastern Distributor did improve travel time from the city to the Airport, rail's attractiveness for some passengers must decrease and patronage fall.
- When capacity increases in the road network this leads to a decline in public transport patronage. An example is when the Harbour Tunnel opened. Combined traffic crossing the Harbour Bridge, Harbour Tunnel and Gladesville Bridge increased by 9,295 vpd within three months. In the same period train journeys to Sydney's north-west sector dropped by 22,000 trips per day at a revenue loss of \$12m per year to the railways. Other examples with more detail in the submission include the opening of M4 Mays Hill to Prospect section, and the M4 and Great Western Highway.
- Similarly, when there are improvements to public transport this leads to increased patronage.
- Considers the proposal will be contrary to state planning policy and detrimental to public transport development due to:
 - ⇒ The economic viability of the New Southern Railway would be affected.
 - ⇒ The Eastern Suburbs Railway would suffer patronage losses. Road travel conditions on the east-west axis would be improved and bottlenecks at Taylor Square would be improved. The result will be that more people will drive to the City from the Eastern Suburbs and that patronage of the ESR will decline.
 - ⇒ Patronage on the Illawarra and East Hills line would fall. The East Line drop would be particularly marked if the M5 proposal proceeds.
- Incorrect assessment of likely impacts on bus services in vicinity of Drivers Triangle, both during construction and operation.
- Bus lanes are not a substitute for a busway.
- Assumption of opportunity for bus services based on surface roads not having induced traffic. The issue of priority on the Eastern Distributor is evaded.
- The EIS does not consider induced traffic. It is the requirement of the Director-General of Planning (Part E) that addresses the need for the proponent to discuss induced traffic. ("Assessment of the potential increase in traffic growth rate due to improved traffic conditions as a result of the proposal..". Considers that the RTA ignored induced traffic because it would reduce the chance of a favourable determination, although there is reference to induce traffic in Working Paper No.3.

- Considers SACTRA has been misrepresented the extent of reporting. Submission quotes EIS Working Paper No.3 (3.2.7 Induced traffic, pages 3.12-3.13) and contrast it with key quotes from SACTRA to demonstrate RTA's "dishonesty" regarding findings of induced traffic.
- SACTRA rejects the fixed demand approach to traffic modelling that is used in the Eastern Distributor and M5 East assessments. It was largely on the basis of reforms to traffic assessment implemented after SACTRA that the British Government scrapped about 50% of its motorway program.
- The Tollway consortia acknowledge the existence of induced traffic and promote its existence for commercial reasons. The ITA prospectus states that traffic volumes on the M5 have reached the stage where congestion regularly occurs and reduces the level of growth in traffic volumes (ITA prospectus p 26).
- Considers the EIS does not adequately address traffic effect results from a deliberate attempt to mislead rather than by accident, incompetence or oversight. This matter should be investigated by public inquiry.
- Asks why there are no maps of traffic flow.
- The treatment of noise issue in the EIS is unacceptable as a basis for informed judgement of the proposal by the public. It is an example of technical mumbo-jumbo used to "justify" widespread environmental degradation.
- Considers that the EIS is legally flawed as activities which are demonstrably part of the project and subject to commercial contract with the Airport Motorway for the Eastern Distributor, are not described or discussed. The proponent has neglected to discuss a 2 km section of the Eastern Distributor proposal (the widening of General Holmes Drive to 8 lanes between Foreshore Road and the junction with the M5 East "south of the airport runway"). The 2 km section of proposed motorway between Marsh Street, Arncliffe and General Holmes Drive is a part of the Eastern Distributor and should have been discussed under the EIS not the M5 East EIS. Both of these section of roads have significant environmental and social impacts and impacts relate to the operation of Sydney Airport.
- A public inquiry into the proposal and certain technical methods used in the EIS should be instituted, including treatment of induced traffic and traffic forecasts.
- Much of the EIS can not be understood unless it is read with the ITA prospectus.
- The BCR method used is spurious and has been deliberately manipulated to show a positive BCR when the BCR is negative and below unity.
- The approach taken to model travel habits/travel savings is based on invalid assumptions:
 - ⇒ It assumes that the two or three minutes saved by each of hundreds of thousands of drivers can be added up and taken to represent real value to the economy at a rate of

\$15 per hour. But this is not the case because most drivers are not being paid to drive, so that the time saved does not represent a cost to the economy. Where time does represent a cost to the economy (eg commercial trip), the time saved would have to be so significant as to enable, for example a truck driver to make an additional delivery trip per day which is seldom the case.

- ⇒ It assumes that traffic congestion is a bad thing and ought to be reduced. This is not so. Congestion serves the function of putting a cost on travel decisions. Without it everyone would want to travel where they wished, resulting in a system that had to be able to carry everyone at peak hour but lie idle for the rest of the day. This would be too expensive for infrastructure. Road congestion is the only tool available to ration road travel.
- The EIS BCR is 2.3. The actual BCR is 0.64. The benefits have been overstated and are short term, and the disbenefits are understated and are long term. The RTA has claimed that the Eastern Distributor would reduce trip times, road operating and accident costs. These have been overstated by the use of a two point profile, a denial of induced traffic growth and an exaggerated annualisation factor. Correcting for these anomalies reduces the BCR to below unity.
 - The proponent has only provided traffic projections for only two dates (1996 and 2011) and it is possible to mathematically model a travel time benefit profile (result shown in figure in the submission.) The real profile of travel time savings shows travel time savings increasing rapidly in the early years of the project but peaking in 2008 before going into a decline as the Eastern Distributor itself reaches its maximum capacity. This is important because a discounted rate (7%) cash flow calculation using this real profile of travel time benefits modifies the NPV of travel time benefits from \$989m to \$873m, \$116 less than for the assumed profile.
 - Other real world factors also reduce the BCR as calculated in the EIS are the reduction of NPV due to induced traffic (based on SACTRA): minus \$436.5m. External cost of induced traffic based on 0.5 cents in the dollar: minus \$43.6m and wrongly calculated annualisation factor: minus \$65.4m. Recalculating the BCR with these factors taken into account yields a BCR of 0.64.
 - EIS WP No.4, p 35 admits that all residential locations along the proposal will be subject to traffic noise exceeding the environmental goal of the EPA. The EPA's goal recognises the serious effect on sleep of night-time heavy vehicle noise. The RTA's "Interim Traffic Noise Policy" does not recognise the serious nature of the problem but attempts to disguise it by averaging the noise, thus obliterating the large fluctuation of noise due to trucks.
 - The project is a predetermined toll road. The operator will only be legally obliged to provide noise protection in accordance with RTA's policy and not the EPA's goal. This requirement has resulted in an inadequate noise barrier system on the M2. There is no agreed position between the RTA and EPA which will ensure the EPA's goal is adhered to. The EIS authors engage in contradictory statements attempting to mislead the reader into accepting this assurance (page 11-10).

- According to the EIS, the RTA will use its "best endeavours" to meet the TNL55 or 10% seriously affected level (EIS p 110-10). Also states that the RTA will try to comply with RTA's Interim Traffic Noise Policy, which is a "largely useless" promise. In reality, only by placing most of the road in a tunnel would be possible to meet the TNL55 level corresponding to 10% seriously affected.

1048. THOMPSON Barry (Federal Airports Corporation, Sydney Airport)

- Olympic traffic to and from the airport will need to be addressed. There should be a contingency plan for alternative routes to be used to direct excess traffic to and from the airport by using an incident management system for short-term impacts for vehicle incidents in the tunnels.
- FAC has undertaken a ground access modelling at the various critical road intersections around the airport during the Olympic period. When traffic analysis is finalised, results will be made available to the RTA's Olympic planning team and network forecasting for consideration.
- The Eastern Distributor needs to serve both as a gateway to Sydney by giving tourists a favourable first impression to Australia and Sydney, and also to satisfy local concerns. It is therefore essential that the Eastern Distributor be appropriately landscaped and designed in accordance with appropriate urban design strategies.
- Any landscaping in the vicinity of the airport will need to comprise plantings which will minimise potential bird hazards to aircraft.
- The Engine Pond System, which forms a part of the Botany Wetlands, carries natural, heritage and archaeological significance. The FAC is currently implementing a number of management actions for preservation of aesthetic, ecological, heritage and archaeological values of this system.
- The RTA should ensure that any construction works at Mill Pond Road/General Holmes Drive and Mill Pond Road/Botany Road intersections do not impact on the above mentioned values of the Engine Pond System and that run-off during construction and operation is suitably managed.
- Removal of noxious weeds from the aquatic bodies east of Southern Cross Drive, between Botany Road and Wentworth Avenue, should be considered to improve aesthetic values and water quality.
- Any road lighting proposed on grade-separated structures (near the airport) will need to comply with airport lighting requirements.
- The main problem arising from the intersection design for Mill Pond Road/General Holmes Drive is the poor management of lanes on Southern Cross Drive before it splits into two at the stop line. There should be three lanes at the stop line to complement the three lane

approach to General Holmes Drive. On Southern Cross Drive, there should be lanes at the point of divergence, two to continue onto the viaduct and two onto Botany Road where a third lane would be developed 60 metres before the stop line.

- The proposal for this intersection is not satisfactory for a principal point of access to a development of regional and national significance such as Sydney Airport.
- The more appropriate solution would be some form of grade separation connecting Southern Cross Drive direct to General Holmes Drive/Joyce Drive for at least airport-bound traffic.
- Any grade-separated structures will need to be scrutinised by the FAC in terms of height restrictions and impact on aircraft operations on the east-west runway.
- The proposed new traffic lights at General Holmes Drive do not appear to be satisfactory at the Mill Pond Road intersection, as the airport-bound traffic along General Holmes Drive will be made to stop at this road intersection. This will slow down the traffic even further, causing congestion along General Holmes Drive during peak period, which is not acceptable to the Corporation.
- Passenger forecast for Sydney Airport used in the EIS were obtained from the Department of Transport and Regional Development.
- Tables provided in the submission (Section 2.3) provide a comparison of the passenger and aircraft movement forecasts quoted in the EIS with the FAC's central and high forecasts.
- It is recommended that the FAC high forecast be used in network modelling by the RTA. The actual throughput in 1994/95 and the FAC's forecasts for subsequent years appear to be higher than those used in the EIS.
- The forecast vehicle trips generated from the Sydney Airport region, as modelled in the recent Ground Access Study Update undertaken by Masson & Wilson for the FAC for AM and PM peak hours for 1995 and 2011, are shown in Attachment A. These traffic volumes should be used in the assessment of traffic using the proposed Eastern Distributor.
- The ease of access to the proposed M5 Motorway provided by the Eastern Distributor may encourage drivers of dangerous goods vehicles to use General Holmes Drive.
- The FAC is strongly opposed to the proposal to permit vehicles carrying highly inflammable liquids or explosives through the General Holmes Drive Tunnel and taxiway bridges.
- Riskcorp's working paper undertaken for the RTA notes that both the tunnel and taxiway bridge are susceptible to transverse forces experienced in an explosion. An explosion beneath the bridges or in the tunnel would have a high probability of causing the roof slab to collapse.

- Fire has the ability to permanently weaken a concrete structure if the reinforcing steel is exposed. Permanent deflection would require complete replacement of the section.
- The FAC cannot afford to have one runway of the airport closed due to an explosion as this would have detrimental effects on aircraft operations and air passengers' convenience, as well as the economic well-being of the airport. Loss of runway for a period as long as six months could affect the travel of 15 million passengers with the consequential impacts on the NSW economy.
- Concerned about the inadequate capacity of the Mill Pond Road/General Holmes Drive intersection for future airport traffic.
- The Sydney Airport Draft Planning Strategy Supplement (DPSS) identifies the need to upgrade the Mill Pond Road/General Holmes Drive intersection in the future into an interchange to improve traffic flow. It has been categorised as phase three work in the Sydney Airport DPSS, anticipated to commence in 1998 through to the year 2010.
- The proposed Eastern Distributor will shift traffic congestion to the Mill Pond Road/Botany Road and Mill Pond Road/General Holmes Drive intersections as a result of increased flow of vehicles from the city to these intersections.
- The proposed improvement suggested by the RTA for the Mill Pond Road/General Holmes Drive, ie three right-hand and two left-hand turn lanes for traffic travelling west on Mill Pond Road for north or south on General Holmes Drive respectively; and two left-hand turn lanes for travelling south on General Holmes Drive to go east on Mill Pond Road is not considered satisfactory.
- The FAC believes that the Eastern Distributor project will create a bottleneck at the Mill Pond Road/ Botany Road/General Holmes Drive intersections.
- An investigation by the Corporation's traffic consultants, Masson & Wilson, to assess the impact on the Mill Pond Road/General Holmes Drive intersection of the Eastern Distributor can be summarised as follows: (a) the proposed intersection improvements will provide measurable improvement on the current intersection operation; (b) the design will cope with the forecast 2011 traffic flows but with a satisfactory level of service; (c) notwithstanding (a) and (b), if the latent demand (ie traffic which is diverted away from the intersection due to delay arising from congestion at that location) is taken into account, the intersection will operate at capacity and be the subject to significant delays on the occurrence of a traffic incidence (breakdown or accident).
- FAC understands that the Eastern Distributor project may end at the General Holmes Drive/M5 Motorway East intersection and not at Mill Pond Road. The FAC is currently evaluating options for strengthening the General Holmes Drive tunnel. This may impact on the RTA's proposal for widening General Holmes Drive from three to four lanes each way. The feasibility of strengthening the existing bridge is dependent on the scope of timing of both the M5 East and the Eastern Distributor projects. Further discussion with the FAC will be necessary to come to a practical and efficient solution in achieving both goals.

- The noise predictions for the operational phase of the proposal have been made on the basis of measurements of existing noise taken in December 1995 at 20 locations near dwellings. The RTA should note that the Commonwealth Government introduced more frequent use of the east-west runway in March 1996 and aircraft takeoffs on the new parallel runway in October 1996, whereby aircraft turn right into the east-west runway flight path so as to share the aircraft noise more equitably. These operations may affect the validity of the noise measurements and the application of the RTA's Noise Level Objectives to noise mitigation measure at some locations.
- The Eastern Distributor's planning should take into account the various studies on the Better Cities South project being undertaken by DUAP. It includes strategic planning, economic gateways, freight movements, etc through the Sydney south area.
- The EIS does not make reference to the Sydney Airport Draft Planning Strategy Supplement (DPSS) 1993, although the RTA's proposal complies with it.
- The FAC supports local stakeholder issues relating to the extent of tunnel provision.
- The FAC suggests the RTA fully investigate the options of tunnelling from the Cahill Expressway to Drivers Triangle (at extra cost of \$28 million or \$200 million through to Todman Avenue) to ensure local stakeholders, community concerns and transport efficiency objectives are met.
- The FAC supports gateways urban design strategy.
- Strategies need to include signage, noise barriers, retaining walls and tunnel exits, and entrances and maximising vistas. The FAC suggest that the RTA treat this proposal as a "flagship" project in this regard.
- Need to identify toll-free routes for motorists who do not wish to pay toll on the Eastern Distributor.
- Investigate electronic tolling to facilitate traffic flow for regular users and reduce congestion.
- Investigate conjoined tolling between Airport Motorway and the Sydney Harbour Tunnel, if other than the northbound tolling is introduced for the Eastern Distributor.
- The creation of any traffic "bottleneck" at the gateway to the airport would reflect poorly on Sydney in the light of increased tourism over the next four years towards 2000 and beyond.
- Improved flow of tourist access into Sydney can positively enhance visits to the City by business travellers and tourists alike.
- Sydney Airport is a national freight hub, handling over \$40 billion exports and imports per annum. The road system around the airport is of operational significance and has the

potential to introduce delays in managing maximum "just in time" efficiencies. Road systems can enhance freight loading times by allowing free flow of freight transport, which also has indirect benefits to the wider NSW community.

- Quicker access to Port Botany and the airport will create increased commercial opportunities by enhancing international competitiveness and help sustain economic growth.
- Measures should be taken to ensure an understanding of alternative access routes to the airport during the construction period. These could include use of media, handout of pamphlets, education of frequent road users and incorporation of a permanent traffic management system (emphasis on improved signage) and overhead electronic warning signage.
- The most significant traffic impacts to the FAC, identified during construction, are an 18-24 month diversion of northbound traffic from South Dowling Street to O'Dea Avenue, Bourke Street and Crescent Street, and diversion of southbound traffic into a temporary carriageway in Moore Park for an unspecified number of months, together with other localised short-term diversions.
- The FAC notes that a detailed Construction Traffic Management Strategy is proposed, but there is no reference to the impacts on airport operation or liaison with airport authorities to maintain reliability of airport access and egress, and suitable forewarning of changes or delays to access.
- Information on road diversion during the various stages of construction of the Eastern Distributor will need to be disseminated to all airport stakeholders, such as airlines, airport bus and coach operators, taxi drivers, etc to ensure that they are fully aware of the changes to the traffic conditions and are able to plan for any potential delays.
- The FAC proposes an Airport Traffic Liaison Committee to be part of the RTA's and Airport Motorway's Construction Traffic Management Strategy.
- The FAC seeks details and further discussions on incident detection and emergency response measures proposed to maintain reliability of airport access and egress.
- Adequate directional signs must be provided to advise motorists travelling to and from the airport.
- Northbound traffic will be diverted onto Bourke Street which may result in increased delays at intersections at both north and southbound traffic. Traffic signal synchronisation at appropriate intersections will be required to improve traffic flow.
- There should be a number of alternative access roads to and from the airport should there be over congestion on primary routes during construction. "Intelligent traffic management systems" should be considered.

- FAC support the Eastern Distributor project, but would like to see it integrated with the future airport infrastructure proposals by the FAC and the NSW Government.
- FAC would welcome the opportunity to jointly review planning to ensure that transport systems (road, rail and air) are integrated to the economic benefit of NSW.

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1050. RAE Fiona

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1051. PARKINSON J

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1052. ROSS Bronwen

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1082. LEE Sally

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1083. HOCK LIM Teik Mr

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1085. McKENZIE Sally

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