

M4 East

Environmental Impact Statement

Appendices A-G

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Appendices

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Appendix

A

Secretary's environmental assessment requirements



Appendix A - Secretary's Environmental Assessment Requirements

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
The Environmental Impact Statement (EIS) must be prepared in accordance with, and meet the minimum requirements of, Part 3 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i> (the Regulation), including:	Chapter 2
1. The information required under clause 6 of Schedule 2 of the Regulation.	Chapter 2 and Appendix B
2. The content listed in clause 7 of Schedule 2 of the Regulation, including but not limited to:	Chapter 2 and Appendix B
a statement of the objectives of the project, including a description of the strategic need, justification, objectives and outcomes for the project, taking into account existing and proposed transport infrastructure and services within the adjoining subregions, and as relevant the outcomes and objectives of relevant strategic planning and transport policies, including, but not limited to, <i>NSW 2021</i> , <i>NSW Government State Infrastructure Strategy</i> , <i>NSW Long Term Transport Master Plan</i> (December 2012), <i>A Plan for Growing Sydney</i> (December 2014) and any other relevant plans;	Strategic need: Chapter 3 Justification: Chapter 30 Project objectives: section 3.3 Outcomes: sections 3.2 and 3.4
an analysis of feasible alternatives to the carrying out of the project and project justification, including: <ul style="list-style-type: none"> an analysis of alternatives/options considered having regard to the project objectives (including an assessment of the environmental costs and benefits of the project relative to alternatives and the consequences of not carrying out the project), and the provision of a clear discussion of the route development and selection process, the suitability of the chosen alignment taking into account environmental impacts, consideration of tunnel construction methods and whether or not the project is in the public interest, and justification for the preferred project taking into consideration the objects of the <i>Environmental Planning and Assessment Act 1979</i>. 	Analysis of alternatives and options considered for the project: Chapter 4 Project objectives Chapter 3 and section 30.1 . Route development and selection process: Chapter 4 Public interest: Chapter 30 The project justification: Chapter 3 and section 30.1 The objects of the EP&A Act 1979: section 30.2
a detailed description of the project, including: <ul style="list-style-type: none"> proposed route, and road treatments, design of the tunnels, interchanges (including tunnel portals and entry and exit ramps), and road user, pedestrian and cyclist facilities (including street furniture and lighting), land use changes, including resumption of residential and industrial lands, and impacts to Crown land, location and operational requirements of construction ancillary facilities and access tracks, and relationship and/or interaction with existing public and freight transport services (including rail, bus and water-based traffic, and rail and bus stops); 	Proposed route, project design: Chapter 5 Land use changes: section 5.11 and Chapter 12 Construction work: Chapter 6 Interaction with public and freight transport: section 5.9, Chapter 6 and Chapter 8

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
an analysis of the project including an assessment, with a particular focus on the requirements of the listed key issues, in accordance with clause 7(1)(d) of Schedule 2 of the Regulation (where relevant), including an identification of how relevant planning, land use and development matters (including relevant strategic and statutory matters) have been considered in the impact assessment (direct, indirect and cumulative impacts) and/or in developing management/mitigation measures;	<p>Clause 7(1)(d): Chapter 2 and Appendix B</p> <p>Relevant planning and development matters: Chapter 3</p> <p>Land use: Chapter 12 Cumulative impacts: Chapter 26</p> <p>Management/mitigation measures: Chapters 8 through Chapter 28 and consolidated in Chapter 29</p>
detail how the principles of ecologically sustainable development will be incorporated in the design, construction and ongoing operation phases of the project; and	Section 27.4
provide an assessment of the cumulative impacts of the project taking into consideration the broader project of WestConnex.	<p>Cumulative impacts: Chapter 26</p> <p>Cumulative impacts of WestConnex: section 26.4</p>
<p>Notwithstanding the key issues specified below, the EIS must include an environmental risk analysis to identify the potential environmental impacts associated with the infrastructure.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> adequate baseline data; consideration of potential cumulative impacts due to other development in the vicinity; and measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment. 	Chapter 28
The EIS must also address the following specific matters:	
Traffic and transport, including but not limited to:	
<p>Details of how the following meet the traffic and transport objectives of the project, taking into account adjacent sensitive land uses, future growth areas, approved and proposed infrastructure projects, and traffic (vehicular, cyclist and pedestrian) needs:</p> <ul style="list-style-type: none"> The preferred alignment and design The proposed interchanges and connections to the surrounding road network Associated road infrastructure facilities 	Section 8.4
An assessment and modelling of operational traffic and transport impacts on the local and regional road network (including Parramatta Road, Queens Road, Gipps Street, and other arterials), and the Sydney motorway network	Section 8.4
Induced traffic and operational implications for public transport (particularly with respect to strategic bus corridors and bus routes) and consideration of opportunities to improve public transport patronage	Sections 8.1 and 8.4.2
Impacts on cyclists and pedestrian access and safety and consideration of opportunities to integrate cycleway and pedestrian elements with surrounding networks	Section 8.4.3

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
<p>Construction traffic and transport impacts of the project (including ancillary facilities) and associated management measures, in particular:</p> <ul style="list-style-type: none"> • Impacts to the road network (including safety and level of service, pedestrian and cyclist access, and disruption to public transport services and access to properties) • Route identification and scheduling of transport movements • The number, frequency and size of construction related vehicles (both passenger, commercial and heavy vehicles) • The nature of existing traffic on construction access routes (including consideration of peak traffic times) • The need to close, divert or otherwise reconfigure elements of the road network associated with construction of the project <p>having reference to the cumulative construction impacts of other infrastructure preparing for or commencing construction</p>	<p>Section 8.3</p> <p>Section 8.3.1</p> <p>Section 8.3.1</p> <p>Section 8.2.2</p> <p>Section 8.3.4</p> <p>Chapter 26</p>
<p>Details of how the project meets the objectives of the overall WestConnex Scheme.</p>	<p>Section 8.4.4</p>
<p>Air quality – including but not limited to:</p>	
<p>An assessment of construction and operational activities that have the potential to impact on in-tunnel, local and regional air quality. The air quality impact assessment should provide an assessment of the risk associated with potential discharges of fugitive and point source emissions on sensitive receivers, and include:</p> <ul style="list-style-type: none"> • The identification of all sources of air pollution and assess the potential emissions of PM₁₀, PM_{2.5}, CO and NO₂ and other nitrogen oxides and volatile organic compounds (eg BTEX) and consider the impacts from the dispersal of these air pollutants on the ambient air quality along the proposed route, proposed ventilation outlets and portals, surface roads and ramps, the alternative surface road network and in-tunnel air quality; • assessment of the worst case scenarios for in-tunnel and ambient air quality, including assessment of a range of traffic scenarios, including worst case maximum flow scenario (variable speed) and worst case breakdown scenario, and discussion of the likely occurrence of each; • details of the proposed mitigation measures to address in-tunnel air quality and the air quality in the vicinity of the portals and any mechanical ventilation systems (stacks and air inlets) including details of proposed air monitoring (including criteria); • demonstrate how the project and ventilation design ensures that concentrations of air emissions meet NSW, national and international best practice for in-tunnel and ambient air quality, taking into consideration the approved criteria for the NorthConnex project; 	<p>Chapter 9, sections 9.6 to 9.7</p> <p>Sources of air quality: sections 9.7 and 9.8 and Appendix H</p> <p>Section 9.7.2</p> <p>Description of ventilation system: section 5.6</p> <p>Mitigation: section 9.9</p> <p>Sections 9.7 and 9.8 and Appendix H</p>

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
<ul style="list-style-type: none"> consideration of any advice provided by the Advisory Committee on Tunnel Air Quality on the project particularly in relation to assessment methodology; details of any emergency ventilation systems, such as air intake/exhaust stacks, including protocols for the operation of these systems in emergency situations, potential emissions of air pollutants and their dispersal, and safety procedures; and 	<p>Reference has been made to the technical papers published by the NSW Chief Scientists Office on behalf of the Advisory Committee on Tunnel Air Quality, in particular the <i>Initial Report on Tunnel Air Quality</i>, July 2014 and the Advisory Committee on Tunnel Air Quality Final Report On the NorthConnex M1-M2 Project revised Submissions and Preferred Infrastructure Report</p> <p>Sections 5.6 and 5.7</p>
<p>details of in-tunnel air quality control measures considered, including air filtration. Justification must be provided to support the proposed measures;</p>	<p>Sections 5.6, 9.7 and 9.9.3</p>
<p>Details of the proposed mitigation measures to prevent the generation and emission of dust (particulate matter and TSP) and air pollutants (including odours) during the construction of the proposal, particularly in relation to ancillary facilities (such as concrete batching plants), and the use of mobile plant, stockpiles and the processing and movement of spoil;</p>	<p>In-tunnel air quality control measures: section 5.6</p> <p>Justification of the air quality management measures: section 9.10</p>
<p>Cumulative assessment of the local and regional air quality due to the operation of Stage 3 – M4 South (Haberfield to St Peters) and surface road operations;</p>	<p>Section 9.8</p>
<p>The air quality assessment, including the setting of air quality criteria must be done in consultation with NSW Health and the Environment Protection Authority and with consideration of any applicable advice provided by the Advisory Committee on Tunnel Air Quality; and</p>	<p>Chapter 7</p>
<p>Modelling (including dispersion modelling) must be conducted in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (EPA, 2005) or a suitably justified and verified alternative method based on current scientific understanding of atmospheric dispersion. Particular attention must be given to the verification of the method of predicting local air quality or meteorological conditions based on non-local or modelled data.</p>	<p>Section 9.2 and 9.4 and Appendix H</p>

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
Human Health – including but not limited to: an assessment of human health impacts with particular consideration of: <ul style="list-style-type: none"> • how the design of the proposal minimises adverse health impacts, • human health impacts from the operation of the tunnel under a range of conditions, including worst case operating condition, • human health risks and costs associated with the proposal, including those associated with air quality, noise and vibration, and social impacts, during the construction and operation of the proposal, and • the Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012) and Air Quality in and Around Traffic Tunnels (NHMRC, 2008). 	Chapter 11 Sections 11.3 and 11.4 and Appendix J Section 11.4 Sections 11.3 and 11.4 Section Error! Reference source not found.
Social and Economic — including, but not limited to: Impacts on directly affected properties and land uses, including impacts related to access, land use, property acquisition (including relations and expenses for those properties acquired) and amenity related changes.	Impacts on properties and land use: sections 5.11, 12.2 and 12.4, 14.3 and 14.4 Details of property acquisition: sections 5.11 Impacts on access: sections 8.3.4 and 12.3.2
social and economic impacts to businesses in the vicinity of the project, including Parramatta Road and other, and to the community associated with traffic, access, property, public domain and amenity related changes;	Sections 14.3 and 14.4
social impact assessment for Concord Oval, including details of existing uses, proximity of sporting club membership and fan bases to Concord Oval, consideration of relocation options and offsets for affected clubs, and consideration of alternative sites (including the Burwood bus depot site); and	Relocation of the Cintra Park Hockey Field is considered under a separate approval in <i>St Luke's Park Sporting Facilities Works Review of Environmental Factors</i> . The findings are summarised in sections 14.3.6 and 14.4.7
a draft Community Consultation Framework identifying relevant stakeholders, procedures for distributing information and receiving/responding to feedback and procedures for resolving community complaints. Key issues that should be addressed in the draft framework should include: <ul style="list-style-type: none"> • traffic management (including property access, pedestrian access), • landscaping/urban design matters, • construction activities, including out of hours work, and • noise and vibration mitigation and management. 	Chapter 7 and Appendix F

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
Soil and Water, including but not limited to:	
Assessment of construction and operational erosion and sediment and water quality impacts, taking into account impacts from both accidents and runoff (ie acute and chronic impacts), having consideration to impacts to surface water runoff, soil erosion and sediment transport, mass movement, and urban and regional salinity. The assessment of water quality is to have reference to relevant public health and environmental water quality criteria, including those specified in the <i>Australian and New Zealand Guidelines for Fresh and Marine Water Quality</i> (ANZECC/ARMCANZ 2000), any applicable regional, local or site-specific guidelines and any licensing requirements	Erosion and sediment and surface water quality, salinity: sections 15.3, 15.4 and 15.5 Ground movement: Chapter 18
Groundwater impacts as a result of the project (including ancillary facilities such as the tunnel control centre and any deluge systems), considering local impacts along the length of the tunnels and impacts on local and regional hydrology including consideration of any Water Sharing Plan and impacts on groundwater flow. The assessment must consider: <ul style="list-style-type: none"> • extent of drawdown; • impacts to groundwater quality; • volume of groundwater that will be taken (including inflows); • discharge requirements; • location and details of groundwater management and • implications for groundwater dependent surface flows, groundwater-dependent ecological communities, and groundwater users. 	Chapter 18 Section 18.4.1 Sections 18.3.2 and 18.4.6 Sections 18.3.1 and 18.4.3 Section 18.4.8 Sections 18.4.8 and 18.5.1 Sections 18.4.2, 18.4.4 and 18.4.5
The assessment should include details of proposed surface and groundwater monitoring and be prepared having consideration to the requirements of the <i>NSW Aquifer Interference Policy</i> ;	Surface and groundwater monitoring: sections 18.1.2 and 18.5. <i>NSW Aquifer Interference Policy:</i> sections 18.1.3 and 18.4.9
Identification of potential impacts of the project on existing flood regimes, consistent with the Floodplain Development Manual (Department of Natural Resources, 2005), including impacts to existing receivers and infrastructure and the future development potential of affected land, and demonstrating consideration of the changes to rainfall frequency and/or intensity as a result of climate change on the project. The assessment shall demonstrate due consideration of flood risks in the project design.	Existing flood regimes: sections 17.3 and 17.4 Existing receivers and infrastructure: sections 17.3 and 17.4 Changes to rainfall frequency and/or intensity as a result of climate change: section 17.4.1 Flood risks to the project design: sections 17.4 and 17.5.
Consideration of waterways likely to be affected by the project, including existing riparian vegetation and rehabilitation of riparian land	Impacts on waterways: section 15.2 Riparian vegetation: section 20.3.1
Identifying potential impacts of the development on acid sulphate soils in accordance with the relevant guidelines and a description of the mitigation measures proposed to minimise potential impacts	Acid sulfate soils impacts: section 16.4.2 Mitigation: section 16.6
A contaminated lands assessment in accordance with relevant guidelines	Chapter 16 and Appendix P

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
a Spoil Management Strategy detailing how spoil will be managed during construction, including likely volumes, likely nature and classification of excavated material, opportunities for recycling, potential disposal sites (including description of sites), stockpile management, and method(s) and route of transportation.	Section 15.5
Urban Design and Visual Amenity – including, but not limited to:	
Consideration of the urban design and visual amenity implications of the project, including supporting infrastructure, during construction and operation. The assessment must identify urban design and landscaping objectives to enhance the interchanges, tunnels, 'cut and cover' and 'slot' arrangements consider resulting residual land and treatments demonstrate how the proposed hard and soft urban design elements of the project would be consistent with the existing and desired future character of the area	<p>Potential impacts to visual amenity during the construction and operation: sections Error! Reference source not found. and Error! Reference source not found..</p> <p>Urban design and landscaping objectives: section Error! Reference source not found. and Appendix L</p> <p>Operational urban design: section Error! Reference source not found. and Appendix L.</p> <p>Consideration of the existing and desired future character of the area: section Error! Reference source not found. and Appendix L.</p>
consideration of the WestConnex Urban Revitalisation Project	Section 13.4.5
identification of opportunities to utilise surplus or residual land, and utilise key structures (such as stacks) for multiple uses i.e. integration with other structures	<p>Surplus and residual land: section 12.3.1</p> <p>Integration with other structures: Section 13.4.3.</p>
identification and evaluation of the visual impacts and urban design aspects of the project (and its components) on surrounding areas	Sections 13.3, 13.4 and 13.4.4.
a consideration of impacts on views and vistas, streetscapes, key sites and buildings	Sections 13.3 and 13.4.
identification of measures to create, promote and enhance connectivity across Parramatta Road, where impacts to connectivity are associated with the project	Section 13.5, sections 8.4.3 and 8.4.4
measures to manage lighting impacts both during construction and operation	<p>Lighting impacts: section 13.3.3 and 13.4.2</p> <p>Mitigation: section 13.5.</p>
artists' impressions and perspective drawings of the proposal from a variety of locations along and adjacent to the route	Appendix L

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
Noise and vibration – including but not limited to:	
An assessment of the noise impacts of the project during operation, consistent with the Road Noise Policy (EPA, 2011) and NSW Industrial Noise Policy (EPA, 2000). The assessment must include specific consideration of impacts to receivers (dwellings, child care centres, educational establishments, hospitals, motels, nursing homes, or places of worship), including specific consideration of sleep disturbance and, as relevant, the characteristics of noise (eg low frequency noise), and identify reasonable and feasible mitigation measures	Chapter 10.5
An assessment of construction noise and vibration impacts, consistent with the Interim Construction Noise Guideline (DECCW, 2009) and Assessing Vibration: a technical guideline (DEC, 2006). The assessment must have regard to the nature of construction activities (including transport, tonal or impulsive noise-generating works and the removal of operational noise barriers, as relevant), the intensity and duration of noise and vibration impacts, the nature, sensitivity and impact to potentially affected receivers, the need to balance timely conclusion of noise and vibration-generating works with periods of receiver respite, and other factors that may influence the timing and duration of construction activities (such as traffic management), and mitigation and management measures.	Section 10.4
The assessment should present, as relevant, an indication of potential for works outside standard working hours, including predicted levels and exceedences, justification for the activity and discussion of available mitigation and management measures.	Section 6.7.2 in Chapter 6 (Construction work) for justification and discussion of out of hours work
Heritage – including but not limited to:	
Impacts to <i>State and local historic heritage</i> (including conservation areas, built heritage landscapes and archaeology) should be assessed. Where impacts to State or locally significant historic heritage are identified, the assessment shall:	Chapter 19
<ul style="list-style-type: none"> Outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the mitigation measures) generally consistent with the guidelines in the <i>NSW Heritage Manual</i> (Heritage Office and Department of Urban Affairs and Planning 1996), 	Section 19.4
<ul style="list-style-type: none"> Be undertaken by a suitably qualified heritage consultant(s) with relevant heritage expertise (note: where archaeological excavations are proposed the relevant consultant must meet the NSW Heritage Council's Excavation Director criteria), 	Appendix S
<ul style="list-style-type: none"> Include a statement of heritage impact for all heritage items (including significance assessment), This should include detailed mapping of all heritage items and how they are affected by the proposal, 	Section 19.3.2 and Appendix S
<ul style="list-style-type: none"> Include details of any proposed mitigation measures (architectural and landscape), 	Section 19.4
<ul style="list-style-type: none"> Consider impacts from vibration, demolition, archaeological disturbance, altered historical 	Section 19.3 and Chapter 10

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
<p>arrangements and access, landscape and vistas, and architectural noise treatment</p> <ul style="list-style-type: none"> • Develop an appropriate archaeological assessment methodology, including research design, in consultation with the Department and the Heritage Council of New South Wales, to guide physical archaeological test excavations and include the results of these excavations, and • Provision of future mitigation strategies for all identified archaeological impacts that would arise from the project. 	<p>Not applicable. No physical archaeological test investigations are recommended.</p> <p>Section 19.4</p>
<p>Impacts to Aboriginal heritage (including cultural and archaeological significance), in particular impacts to Aboriginal objects and potential archaeological deposits (PAD), should be assessed. Where impacts are identified, the assessment shall:</p> <ul style="list-style-type: none"> • outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the measures) generally consistent with the Draft Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation (Department of Environment and Conservation (DEC) 2005a), • be undertaken by a suitably qualified heritage consultant(s), • demonstrate effective consultation with Aboriginal communities in determining and assessing impacts and developing and selecting options and mitigation measures (including the final proposed measures), • assess and document the archaeological and cultural significance of cultural heritage values of affected sites, and • develop an appropriate assessment methodology, including research design, in consultation with the Department and the Office of Environment and Heritage, to guide physical archaeological test excavations of the sites and areas of PAD identified in a manner that establishes the full spatial extent and significance of any archaeological evidence across each site/area of PAD, and include the results of these excavations. 	<p>Chapter 22</p> <p>Section 22.4</p> <p>Appendix V</p> <p>Section 22.1</p> <p>Section 22.3</p> <p>Not applicable – no physical excavations are recommended</p>
Biodiversity – including, but not limited to	
<p>An assessment of the potential ecological impacts of the project, with specific reference to vegetation and habitat clearing, connectivity, edge effects, weed dispersal, riparian and aquatic habitat impacts and soil and water quality impacts. The assessment must:</p> <ul style="list-style-type: none"> • Make specific reference to impacts on threatened species and endangered ecological communities, • Have reference to the <i>Draft Guidelines for Threatened Species Assessment</i> (Department of Environment and Conservation (DEC)/Department of Primary Industries (DPI) 2005), <i>Threatened Biodiversity Survey and Assessment: Guidelines for Developments and Activities</i> (DEC 2004), <i>Guidelines for Aquatic Habitat Management and Fish Conservation</i> (DPI 1999) and any relevant draft or final recovery plans. 	<p>Section 20.3 and 20.4</p> <p>Sections 20.31, 20.32 and 20.4</p> <p>Section 20.1.1</p> <p>Please note that due to no potential impacts on aquatic habitat or fish passage as a result of the Project (refer to section 20.3.1, reference to the <i>Guidelines for Aquatic Habitat Management and Fish Conservation</i> (DPI 1999) was not required.</p>

Secretary's Environmental Assessment Requirement	Where addressed in the EIS
<ul style="list-style-type: none"> Include details of any offset measures that may be required, including demonstration that the measures are consistent with the <i>Principles for the use of biodiversity offsets in NSW</i> (Department of Environment, Climate Change and Water (DECCW) 2008). 	Section 20.6
<p>Note: The Department encourages you to undertake this assessment in accordance with the <i>Framework for Biodiversity Assessment</i> (OEH 2014a) and the <i>NSW Biodiversity Offsets Policy for Major Projects</i> (OEH 2014b).</p>	Section 20.1.1
Environmental Risk Analysis — notwithstanding the above key assessment requirement,	
The EIS must include an environmental risk analysis to identify potential environmental impacts associated with the infrastructure (construction and operation), proposed mitigation measures and potentially significant residual environmental impacts after the application of proposed mitigation measures. Where additional key environmental impacts are identified through this environmental risk analysis, an appropriately detailed impact assessment of this additional key environmental impact must be included in the EIS.	Chapter 28
Consultation	
<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners.</p> <p>Local, State and Commonwealth government authorities, including the:</p> <ul style="list-style-type: none"> Environment Protection Authority, Office of Environment and Heritage (including Heritage Division), The Heritage Council of NSW, Department of Primary Industries, NSW Office of Water, NSW Health (including Local Health Districts), Transport for NSW, UrbanGrowth NSW, Sydney Olympic Park Authority, Ashfield City Council, Auburn Council, Burwood Council, City of Canada Bay Council, and Strathfield Municipal Council. 	Chapter 7
specialist interest groups, including Local Aboriginal Land Councils, Aboriginal stakeholders, and pedestrian and bicycle user groups;	Sections 7.3 and 7.4
utilities and service providers;	Sections 7.3 and 7.4
the public, including community groups and adjoining and affected landowners	Sections 7.3 and 7.4
The EIS must describe the consultation process and the issues raised, and identify where the design of the project has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.	Sections 7.1 and 7.4