

## **Bayside Council Submission**

### **F6 Extension Stage 1 (New M5 Motorway at Arncliffe to President Avenue at Kogarah – Environmental Impact Assessment)**

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the F6 Extension Stage 1 to President Avenue, Kogarah. The proposed F6 Extension is a complex project that will have a significant impact on the Bayside Local Government Area (LGA). Bayside Council acknowledges the preliminary planning and consultation that Roads and Maritime Services (RMS) has undertaken with Council and the community, including the establishment of the RMS Stakeholder Liaison Group and RMS and Council Staff Technical Working Groups.

On 19 December 2017, Bayside Council responded to the NSW Department of Planning and Environment draft Secretary's Environmental Assessment Requirements (SEARs) for the proposed F6 Stage 1 extension. This submission highlighted a number of Council's concerns including:

- 1) *Traffic and parking congestion*
- 2) *Impacts on community recreation space*
- 3) *Sustainability Impacts*

In August 2018, Bayside Council responded to the Overview documentation, with the submission highlighting the following Council concerns:

- 1) *Priority for Section B works (Motorway Kogarah to Taren Point)*
- 2) *Ensure connection of the F6 extension to Sydney Airport*
- 3) *Investigate connection of the Port Botany road freight route to the F6 extension*
- 4) *Impact on sporting fields*
- 5) *Impact on open space*
- 6) *Provision and safety of active transport*
- 7) *Environmental (including biodiversity, flooding, water quality and contamination) consideration*

- 8) *Land acquisition considerations*
- 9) *Traffic impacts*
- 10) *Impacts on local business*
- 11) *Community construction fatigue*
- 12) *Urban Design considerations*

The EIS comprises seven volumes which provide detailed information and complex data requiring analysis. Council wrote to the Department of Planning and Environment (DPE) 19 September 2018 requesting a longer exhibition period, with a proposed exhibition period of 28 days insufficient for both Council and the Bayside LGA community to review and respond to the EIS. The DPE in their response of 24 September 2018 did not commit to an extended exhibition period. In October 2018 Council again resolved to request an extension to the public exhibition period.

Whilst the exhibition period was extended for a further 7 days, the 35 day exhibition period is still inadequate to allow for proper consideration of the many and significant issues. This is further shortened by the need to meet the Council meeting cycle. Council has, therefore, been unable to undertake a detailed analysis of the EIS and means that Council has not provided detailed comment on all areas of the EIS including air quality, noise and traffic modelling.

If approved the F6 project would be undertaken generally in accordance with the description in this EIS and any conditions issued upon approval of the project.

This submission largely follows the structure of the EIS.

#### Overview Comment

This project does not include Stage 2 (to connect to Taren Point) nor does it provide a direct link to Port Botany, both of which are key priorities for Bayside Council. This omission is therefore reflected in Council's response to Project Benefits, Consistency with Strategic Planning, Corridor Analysis Options and the F6 Extension Staging Options sections of the EIS.

Furthermore Council requests that it is part of any decision making by the State Government for deciding the future of the F6 open space corridor, particularly in light of increased population projections for the Bayside LGA.

## 1. F6 Project Strategic Context and Project Need

#### *As noted in the EIS*

- Across Sydney traffic growth is forecast to increase by 1 million extra road users in the next decade and nearly twice the number of freight movements by 2031. In Sydney's south district over 50% of journeys are made by car.
- There is a missing Regional Link with no motorway between the existing M1 Princes Motorway south of Waterfall and the Sydney motorway network. All local and through traffic is required to use the arterial roads network including the A1 Princes Highway, the A3 King Georges Road and the A6 Heathcote Road/New Illawarra Road.
- Traffic congestion reduces capacity for freight vehicles to move from and to the gateways of Sydney Airport, Port Botany and Port Kembla.

- The proposed F6 extension project is stage 1 of the F6 Extension from Arncliffe to Kogarah.
- At the local level, President Avenue to St Peters interchange corridor is congested resulting in long journey times and Grand Parade experiences high volumes of traffic including heavy vehicles. This through traffic between Bay Street and the M5 East also impacts on pedestrian and cycle safety and amenity of the area.
- By 2036 the population of the South District will grow by 204,000 and the Eastern City District by 325,000. With over 50% of journeys by car there will be continued growth in traffic on Sydney's roads.
- Future trends anticipate increasing use of public transport, however, there will be a continuing need to make provision for growth in commercial and freight travel and to reduce congestion.
- This project would form a key component of existing and committed Sydney Motorway network – a direct link with the WestConnex motorways, through to the proposed Sydney gateway and Western harbour Tunnel projects. It would also include stub tunnels to connect to future stages of the F6 Extension.

#### *Council response*

- The large volume of southbound motorway traffic expected to exit the tunnel onto President Avenue will likely result in traffic congestion in southern Sydney. Council maintains that it is imperative that the announcement and planning for Stage 2 (Kogarah to Taren Point) occurs as part of Stage 1.
- The EIS does not include a motorway connection to Australia's busiest port, where road container movements are expected to triple in over the next 20 years. Bayside Council strongly advise that investigations begin into direct Port Botany access at/or near the Marsh Street interchange as a high priority
- In addition to the proposed F6 motorway Council strongly advocates for improved public transport options and active transport routes to reduce ongoing demand on roads.

## 2. Project Benefits

#### *As noted in the EIS*

A business case completed for the F6 Extension Stage 1 indicated:

- It would reduce travel time, improve reliability and safety for road users and provide better connectivity for active transport
- It would make it easier for people to get to jobs, for businesses to access their markets and for heavy vehicles to move more efficiently through southern Sydney
- It would result in easier access for residents when through traffic is reduced from local centres.
- Would contribute to the Greater Sydney Commission's 30 minute city concept.
- The project would provide opportunities for place making with the implementation of the *Better Placed* policy at key locations along The Grand Parade and the Princes Highway with reduced traffic.
- The Rockdale Wetlands Open Space Corridor (part of the Sydney Green Grid identified in the Eastern City District Plan) would be protected with the Motorway predominantly underground.

#### *Council response*

- The F6 project aims to improve personal motor vehicle accessibility and in doing so seeks to complement the NSW Governments '30-minute city' paradigm. This concept of accessibility and productivity must also be addressed with sustainable transport options incorporated into the greater project scope. That being, ensuring the provision of high quality, desirable public transport amenity (such as shelters, expanded bus services, last mile options) are included as part of a regional vision for community movement. Council therefore seeks RMS, Transport NSW in collaboration with Bayside Council investigate options of priority public transport options be part of the planning for the F6 extension.
- RMS work and provide funding to Bayside Council to implement Better Placed policy at key locations along Grand Parade and Princes Highway.

### 3. Consistency with Strategic Planning

#### *As noted in the EIS:*

- Australian Infrastructure Plan – F6 Identified as a priority project to connect Wollongong with the Sydney CBD
- NSW State priorities –improving road travel reliability.
- NSW State Infrastructure Strategy – F6 extension identified as a priority.
- Future Transport 2056 – F6 Extension Stage 1 identified as a committed initiative for the 0-10 year years. Future stages identified as a visionary motorway for investigation.
- Greater Sydney Region Plan – listed as a committed initiative for immediate details planning.
- Eastern City District Plan identifies the F6 extension as improving motorway access and freight movement from the Eastern City across Greater Sydney and to Port Kembla/Illawarra and improve amenity and liveability in local centres of Brighton–Le-Sands and Rockdale.
- South District Plan – notes planning underway for the F6 Extension linking the new M5 Motorway near Sydney Airport with the Princes High Way at Waterfall.
- NSW Freight and Ports Strategy – with freight forecast to double over the next 20 years, this project would expand capacity on the motorway network to the significant gateways of Sydney Airport, Port Botany and Port Kembla through network efficiency, increasing network capacity and improving network sustainability by removing a large number of heavy freight vehicles using The Grand parade and Princes Highway.

#### *Council response*

- Certainty is sought by Council and indeed the local community with reference to an expected completion date for the entire F6 extension project from Arncliffe to Loftus (also note Council's comments in relation to the F6 Staging Options). Guarantees are sought for extending detailed design for the next stages – providing a timeline for the completion of the project will go some way to alleviate concerns that the F6 Stage 1 extension is merely moving a traffic bottleneck 4kms to the south, replicating issues that were present previously.
- Council considers that the project will not adequately benefit the efficient /productive movement of Port-orientated freight traffic from both Port Botany and Port Kembla travelling through the Bayside LGA. The EIS does not include a motorway connection to Australia's busiest port, where road container movements are expected to triple in over the next 20 years. The project instead remains reliant on the utility of General Holmes Drive as its southern thoroughfare, detracting from any future vision of local centre

amenity and liveability, while creating considerable safety concerns for the residents and visitors of this beachside destination. This is exacerbated by the Sydney Gateway project which does not provide a motorway link to Port Botany.

- Council is undertaking the development of a Master Plan for Brighton-Le-Sands. The lack of a motorway connection to Port Botany is a significant impediment to Council's work to enhance the liveability of this area, as a reduction in traffic on The Grand Parade is critical to improving amenity in this important destination for Sydneysiders and visitors.

## 4. Project Alternatives

*As noted in the EIS:*

The EIS identifies four project alternatives.

- The base case or do nothing/do minimum – the currently planned and funded transport infrastructure improvement would not meet the forecast traffic needs.
- Pinch Point program - such as the Pinch Point program (including increasing capacity at intersections along the Princes Highway (Forest Road and Wickham Road at Arncliffe, Rockdale Plaza, Rockdale and Gray Street and Rocky Point Road Kogarah) and at The Grand Parade and President Avenue.
- Sydney Clearway program - corridors for investigation in southern Sydney include
  - Princes Highway through Blakehurst, Kogarah, Rockdale and Wolli Creek
  - Rocky Point Road from Kogarah to Sans Souci
  - General Holmes Drive, The Grand Parade and Sandringham Street from Kyeemagh to Sans Souci.

These are being investigated separately to the F6 Extension project.

- Bus Priority Infrastructure Program – improve bus services with integration of connections to existing train services, including upgrades to Arncliffe and Kogarah and a new high frequency route between Miranda and Sydney Airport.
- Arterial road improvements – by 2036 traffic modelling predicts key arterial roads will be operating above or at capacity in peak periods.
- Rail Infrastructure Improvements – a number of initiatives have been identified for investigation. However road travel is still forecast to grow and public transport initiatives could partially contribute to relieving congestion. The project would not preclude rail infrastructure improvements from occurring.
- Motorway Option (development of the F6 Extension) – this option is preferred as it will improve:
  - Journey times for travellers between the Illawarra, Southern Sydney and strategic centres in greater Sydney.
  - Support the future growth and productivity of southern Sydney and the Illawarra by improving connectivity between these regions and strategic centres in greater Sydney.
  - Support urban renewal at key centres on arterial roads by reducing through traffic along corridors that perform a key place function.

*Council response*

- Bayside Council does not support the proposed clearway extensions along Princes Highway, Rocky Point Road and The Grand Parade as Council believes that any expansion of the clearways program would impact local business and the ability of residents to access local destinations. As outlined in the Mayoral Letter (March 2018) Council has requested consultation with Council, residents and community groups be

undertaken before any consideration for extending the operation of clearways in Bayside LGA. NSW Government must substantiate the need for clearways, qualify the economic impact to local business and demonstrates how the public domain along these roadways will be improved for residents, businesses and visitors to the area before any such program is considered to be implemented.

- Council supports investigation of public transport options, with public transport already at capacity.
- Council maintains that it is imperative that the announcement and planning for Stage 2 (Kogarah to Taren Point) occurs as part of Stage 1, as without this there will be significant congestion in the Bayside local area.

## 5. Corridor analysis options

As noted in the EIS:

There are four motorway corridor options identified which are described as:

- F6 option – broadly aligned with land previously reserved for F6
- A1 option – broadly aligned with existing A1/A36 arterial road (Princes Highway)
- A3 option – broadly aligned with existing A1/A3 arterial road ( Princes Highway, King Georges Road)
- A6 option – broadly aligning with existing A6 arterial road (Heathcote Road, New Illawarra Road, Alfords Point Road, Davies Road and Fairford Road).

The F6 corridor is preferred as it:

- Would cater for the eastern distribution of future traffic demand
- Provide a motorway solution without removing arterial roads
- Have a greater impact on reducing congestion for north-south traffic
- Create in conjunction with the New M5 Motorway and other projects a new north-south motorway through Sydney, completing a missing connection in the national highway.

### *Council response*

#### Northern Connection

- Bayside Council have requested as part of its August 2018 submission that the northern connection (Marsh St) should include access roads that enable direct Port Botany (Foreshore Rd) access. The EIS does not include these access roads. Port freight container volume (TUE units) is predicted to triple from 2.5 million units (2018) to 7.0 million by the year 2040. It is forecast that approximately 80% of that container freight will be serviced by the road network.
  - Considering the adverse impact to the community and strategic value of the Brighton-Le-Sands town centre if Grand Parade remains a main freight route, Bayside Council strongly advise that investigations begin into direct Port Botany access at/or near the Marsh Street interchange.
  - The Level of Service on the surrounding road network be monitored post completion of the M5 East and Sydney Gateway projects
- The Sydney Gateway project (adjacent RMS motorway project) has detailed Airport access only from the St Peters Interchange, with no direct connections that would otherwise provide Port Botany freight to otherwise access the F6 and bypass Brighton-Le-Sands. In the absence of a direct motorway connection, General Holmes Drive and the local town centre of Brighton-Le-Sands will continue to be burdened by the movement of south-bound freight traffic volume into the future.



- Brighton-Le-Sands is a local, regional and international destination in its own right and the attractiveness of the option of downgrading of General Holmes Drive away from a freight passage route (movement corridor) to that functioning as destination (place) should be acknowledged by the RMS as part of this project. As highlighted earlier this potential future road function of General Holmes Drive aligns with Bayside Council master planning for Brighton-Le-Sands and seeks to enable foreshore accessibility to the residents of the Kyeemagh, Brighton-Le-Sands and nearby suburbs.

#### Southern Connection

- Request Stage 2 progress through to Taren Point (be accelerated) and not terminate at President Avenue (also refer to Staging Options comments).

#### Overall Comment

- Given the existing F6 corridor is no longer required for its original purpose, Council requests that it is part of any decision making by the State Government for deciding the future of the F6 open space corridor, particularly in light of increased population projections for the Bayside LGA.

## 6. F6 Extension Staging Options

#### *As noted in the EIS*

- A multi-criteria analysis of staging and incremental works was undertaken to confirm the most appropriate area to commence construction. Six options were identified being:
  - New M5 Motorway to President Avenue (Section A) plus arterial upgrades
  - New M5 motorway to Taren Point Road (Section A + B)
  - New M5 Motorway to Port Hacking Road (Section A + B+ C)
  - New M5 Motorway to President Avenue (Section A) plus Taren Point to Loftus (Section C)
  - Taren Point to Kingsway (Section C)
  - Taren Point to Loftus (Section C)

Section A was identified in the EIS as the preferred first stage, providing both improvements regarding congestion and a link to the motorway network. The EIS notes that that this project is the first stage of the F6 extension but is considered as a standalone project given its own objectives and project benefits.

#### *Council response:*

- The large volume of southbound motorway traffic expected to exit the tunnel onto President Avenue will likely result in traffic congestion in southern Sydney. The Infrastructure Australia Priority list released in July 2018 identifies the construction of the F6 corridor from Arncliffe to Waterfall as a priority initiative. Council maintains that it is imperative that the announcement and planning for Section B works occurs as part of Stage 1. As such Option 2 - New M5 motorway to Taren Point Road (Section A + B) should be the preferred option or Option 3 - New M5 Motorway to Port Hacking Road (Section A + B+ C).

#### *Connection to Sydney Airport and Port Botany*

- Council Minute 2018/110 (13 June Council Meeting) expressed "That a connection to Sydney Airport for those coming from the south be included in this project." This

connection is a key issue for Council, with a record 43.3 million passengers passing through Sydney Airport and these numbers are projected to increase to 74.3 million passengers as well as 1 million tonnes of freight entering Sydney by Sydney Airport. It is acknowledged that the proposed Sydney Gateway project could provide a connection to the airport via the St Peters Interchange, however this is still in the planning stage.

- As highlighted previously, the EIS does not address port access and the proposed Sydney Gateway project only provides access into the airport and not to Foreshore Drive. Council requests the RMS investigate a direct motorway connection from Port Botany to the F6 via an access point at the Arncliffe interchange.
- Bayside Council are aware of current limitations placed on the transport of dangerous and hazardous goods through tunnel structures. Any further discussion surrounding prospective modifications to these controls will be welcomed in an effort to understand the impact to the community.

## 7. Bicentennial Park Reinstatement

The impact of the project on Rockdale Bicentennial Park is significant during both the construction and operation phases. It will be essential for alternative facilities to be planned and delivered prior to commencement of works and the reinstatement of open space post construction. It is noted RMS is funding a Recreation Needs Assessment and working with Council to ensure the best outcome for the Bayside community.

### *As noted in the EIS*

- Sporting fields and recreational facilities within Rockdale Bicentennial Park would be directly impacted.
- Prior to construction commencing some of these facilities would be offset with new facilities.

### *Council response*

- The impact of the project on Bicentennial Park Brighton-Le-Sands is significant. The planning and management for the relocation of facilities and infrastructure, both temporarily and permanently needs to be prioritised.
- To better understand the potential impacts of the F6 on the community assets in Bicentennial Park precinct the RMS has agreed to fund a Recreation Needs Analysis and will be jointly managed by Council and RMS. This study has commenced and will identify ways in which the impacts can be mitigated and compensated. Interim feedback has been provided to RMS on temporary impacts and permanent impacts. The Recreation Needs analysis will be provided to the Department of Planning and Environment when complete.
- As previously noted, a detailed scope and program will need to be agreed by Council and the RMS, ensuring relocation works are completed prior to construction of the site compound at Bicentennial Park.
- As highlighted in Bayside Council report (14 November 2018) Item 8.3 Council has identified a number of options for compensation including:
  - Certainty of land tenure for Council where temporary and permanent assets are to be located
  - Transfer of ownership to Council (or care and control) of residual land at Bicentennial East soccer fields



- Exploring permanent community recreation opportunities on land that it held in Trust for road and recreation purposes or on other Council land.

It is requested this November 2018 Council report is considered as part of Council's submission.

- The scope and delivery for the re-instatement of Bicentennial Park needs to be agreed by Council and RMS, including a program for completion. The construction of playing fields at Brighton Memorial playing fields will need to be considered to cater for the permanent loss of a playing field at Bicentennial Park. These works would be completed on behalf of council by the appointed contractor.
- The F6 tender documents should include a performance specification associated with the replacement of the sporting facilities with detailed design and development consent approval, either in a new proposed location or reinstated back on the existing site.

## 8. Shared Cycle and Pedestrian Pathways

Bayside Council supports the provision of active transport into this project. However, Council has identified the need for further consideration of route alignment and consultation.

### *As noted in the EIS*

- The preferred shared cycle and pedestrian pathway route is via a shared bridge over President Avenue between Bestic Street and Civic Avenue. It would connect:
  - Bestic Street and cycleway north of Bestic, along Muddy creek
  - West Botany Street, opposite Ador Avenue Reserve
  - Bruce Street, Francis Street, Bay Street and England Street, Brighton-Le-Sands
  - West Botany Street next to Rockdale Bicentennial Park
  - Civic Avenue, Kogarah
- Detailed design to be developed in consultation with stakeholders, including Bayside Council.

### *Council Response*

- A separated 3.0m (cycle) + 1.5m (pedestrian) path width is preferred for the main cycle/pedestrian facility where space allows in the interest of user safety, desirability and overall quality.
- Secondary feeder paths to the main corridor are sought to be incorporated into the design, this will enable greater community access and accessible east/west movement. Bayside Council cycleway maps can provide guidance on the preferred east/ west connections.
- Shared Paths are requested on the main east/west roads (Bay and President) enabling access between town centres of Rockdale and Brighton-Le-Sands (Bay St) and Kogarah and Botany Bay Foreshore (President Avenue) – the widths are requests to be at a minimum of 3.0m and designed to be of high quality.
- It is requested that the project incorporate a shared path signalised crossing point at the southern portal entrance (on the northern side of President Avenue). The pedestrian and cycle access is critical to both the employment and education centre of Kogarah, but also to allow local community foreshore and sporting field access. A diversion to a crossing point 200m m to the north is an undesirable outcome.
- It is advised that the cycleway (north-south) be that of a separated facility as opposed to a shared path, i.e. an active transport corridor that is separated from traffic, with pedestrians separated from cycle traffic where space allows. Separation of users on such an active travel corridor is designed to enhance user safety and encourages equitable

community participation with a safe and desirable transport link as both a commuter and recreation cycleway.

- The active transport route needs to be moved out of the wetland/endangered ecological communities, particularly at Scarborough Park.
- The Active Transport facility is requested to be within open space corridor and is firmly requested to not re-enter the road network at England/Crawford Street. Doing so would act to render the facility undesirable for path users. Investigations should be made to ensure the active transport path is direct, safe and efficient in the effort to maintain the path's considerably high quality in a north/south direction within the Rockdale wetlands corridor.
- Council requests RMS to undertake a Road Safety Audit of the existing Commuter Cycleway along Crawford Road, O'Connell Street and Chuter Avenue as the F6 EIS indicates that traffic volumes will increase along these streets and this may endanger cyclists using this route.
- RMS upgrade the commuter cycleway in O'Connell Street and Chuter Avenue between President Avenue and Barton Street as part of the proposed works to encourage non vehicle transport options.

#### Dedicated Cycle and Pedestrian Bridge

- The shared path bridge over President Avenue requires a southern connection, i.e. to Barton Street or further to San Souci, particularly as the current bridge facility proposed in the EIS will not enable a southern access to the wider network.
- A southern active transport corridor should be extended to Riverside Drive, San Souci along the open space / green grid corridor.
- The bridge (if proposed on the western side of the interchange) would enable access to the eastern / foreshore as a path option, in addition to a southerly route.
- Construct a cycle path on the eastern side of Scarborough Ponds between President Avenue and Barton Street
- RMS works closely with Bayside Council in finalising the active transport/shared pathway route as part of the F6 project

## 9. Construction

Council has a number of concerns in relation to the construction ancillary facilities, the need to minimise the impact from heavy truck movements, parking and Council land.

#### *As noted in the EIS*

The Construction Strategy would utilise six key construction sites:

- Arncliffe construction ancillary facilities at Kogarah Golf Course (C1)
- Rockdale construction ancillary facility within an RMS depot at West Botany Street (C2)
- President Avenue construction ancillary facility within Bicentennial Park and part of Scarborough Park North and a site west of Botany Street (C3)
- Shared cycle and pedestrian pathways at Brighton-Le-Sands within the recreation area between West Botany Street and Francis Avenue near Muddy creek (C4 and C5)
- Princes Highway construction ancillary facility on the north east corner of the President Avenue and Princes Highway intersection (6).

#### *Council Response:*

Arncliffe construction ancillary facility

- Council would like to work with RMS on the design, orientation and location of the ventilation and water re-use facility. Council will be aiming to minimise the area of community land to be acquired by RMS and the impacts of the facility to park users in the future.
- For correct identification Council request that 7.3.2 Arncliffe construction ancillary facility in the EIS clearly define the boundaries between the Kogarah Golf Course lands at Marsh Street and those lands owned by Bayside Council.
- Kogarah Golf Club had leased a portion of Council land for their golf course, prior to RMS' current occupation for the M5 project. Council requests that the proposed design of the Arncliffe Ancillary facility show the proposed built form as it straddles the boundaries of RMS/Council and the Kogarah Golf Course.
- Council has provided previous commentary to RMS in relation to the potential spoil opportunities and Council requests the proponent prior to the engagement of contractors to engage fully with council on the potential opportunities for the management of spoil.

#### Rockdale construction ancillary facility

- Council has no objection to the use of the existing RMS depot located on West Botany Street, other than consideration of traffic impacts of increased truck movements on West Botany Street.
- The use of the Rockdale facility impacts on the local community with heavy truck vehicular movements and noise. It is not isolated and does not have barriers or main roads that would provide a buffer zone to the residents similar to the Arncliffe site. Council's preference is that the main spoil removal occurs at the Arncliffe facility.

#### President Avenue connection, construction ancillary facilities

- As noted, there will be an impact on existing recreation facilities.
- The relocation of the Skate Park, playground and sporting fields will need to be completed prior to commencement of construction of this facility, to ensure minimal impact on current users of this space. As noted above the Recreation Needs Analysis jointly managed by Council and RMS has commenced and will identify ways in which the impacts can be mitigated and compensated. Interim feedback has been provided to RMS on temporary impacts and permanent impacts.
- Council will require a performance brief for the appointed contractor which demonstrates a program to relocate works at the cost of the F6 extension.

#### Princes Highway construction ancillary facility

- Location of Princes Highway and President Avenue intersection upgrade works. Council will require further details of the location and impact on traffic or adjacent land uses to be able to comment on this.
- Ingress and egress of vehicles needs to be managed appropriately within the current transport networks and consideration should be given to the proximity to the local school and technical college as part of this.

#### Ancillary facility for the shared cycle and pedestrian pathways

- Council will require detailed design and consultation in relation to access to either side of Muddy Creek Recreation Area.

#### General Comment

- Most construction sites are located where demand for street parking is high and Council anticipates parking concerns will be further exacerbated when construction commences. Council must be provided with a copy of the Construction Traffic and Access Management Plan (CTAMP) with details for shuttle bus services to and from these sites.
- Bus companies must be contacted for changes to bus stops and bus zone locations and provided with an opportunity to comment on any proposed changes. Compliance with Disability Discrimination Act (DDA) may require provisions of temporary bus pads at the new locations. Council should be consulted and provided with details prior to these changes occurring.
- Council seeks consultation with where those boundaries intercede with Council owned properties.
- RMS should demonstrate to Council appropriate environmental management of the ancillary facilities (listed at 7.3.1 – 7.3.8). This includes (but is not limited to) Environmental Management Plans (EMP), Standard Operating Procedures (SOPs), Safe Work Method Statements (SWMS), Remediation Action Plans (RAP)(where appropriate) for all activities planned to be undertaken upon these sites, including (but not limited to) storage of spoil, water treatment, excavation of land etc.
- Geotechnical testing to ascertain the condition of the land prior to works will need to be undertaken and equivalent testing prior to handing back the land.
- RMS will be required to accept the land in its current condition.
- Given the potential for significant onsite contamination associated with former land uses, council requires detailed environmental reports and remediation action plans in relation to any construction works involving the excavation of soil from the areas.
- Bayside Council requests mechanisms which requires the F6 proponents to engage with Council in terms of these and additional construction sites, transport impacts and potential land use sites.

#### Project Construction Activities

- A detailed program and scope for preparatory investigations will need to be provided to Council, to ensure we can mitigate impacts on users where possible.
- Council will be the first point of contact for the community should issues arise and it is essential that Council understands the scope and timing of these works to notify users and engage with the contractor or contractors if issues are identified by the community.
- Council would also request that in terms of environmental site testing and geotechnical works, that council is extended the ability to both rely and use work that is undertaken as part of the F6 project.
- The Council has previously requested that clean stock pile spoil be reused to enhance local recreation areas and minimise impacts on local transport networks. Council has significant land holdings where the reuse of spoil would achieve a significant community benefit. Council seeks a Spoil Management Plan which identifies spoil locations and necessary approvals

#### Construction of permanent operational infrastructures (7.4.5)

##### Ventilation Facility

- The Rockdale ventilation facility will be constructed on the west side of West Botany Street and is located within close proximity to existing residential properties including high-density residential and traditional housing. Council requests that there is further consultation on the impact of these ventilation facilities in terms of air quality, size and structure and ongoing noise given proximity to the community in general.

Permanent Power Supply Connection Heading.

- Council notes that there is a proposed new permanent power supply connection that will be trenched and run along significant parts of the new F6 extension. Council has large areas of currently un-serviced land that forms part of the recreational facility and that there may be opportunities for small independent substations to be situated along the route to enable connection to the power and provide for other community facilities within the parks that may not be existing.

## 10. Spoil Storage, Transport and Disposal Options

The over one million tonnes of spoil that will be generated will require to be removed from the project sites. Bayside Council supports the use of clean spoil to be used locally and that reuse options should be determined upfront to ensure that public benefit is maximised.

*As noted in the EIS*

- 1.4 million cubic metres of spoil will be removed with spoil stored at each of the three construction ancillary facilities.
- Spoil removal by heavy vehicles is the preferred transport option for the project. Other options, such as removal by barge will be considered at the detailed design stage.
- There will be opportunities to use uncontaminated spoil within the project.

*Council response*

Spoil Transport Options

- Council has reviewed the proposed spoil transport options including heavy rail and potentially barge transport. Council understand both of those options were considered for the previous WestConnex project and neither option was feasible. The obvious disadvantage of heavy transport to relocate spoil is:
  - Impact on existing road networks.
  - Noise and fume pollution from heavy truck movements on residents.
  - Damage to existing road network.
  - Traffic congestion associated with large transport truck movements.
- Bayside Council notes that several spoil management sites have been identified in Chapter 21 as part of the waste management, which range from 40 to 70 kilometres from the project. Council has previously engaged with Roads and Maritime Services in relation to feasible spoil management options located within the council (Bayside Council area), with a clearly demonstrable public benefit in terms of the reductions of truck movements on the local street network and associated impacts and to provide a public benefit by using the spoil for the rehabilitation of dilapidated lands most notably used as former tip sites.
- The EIS should extend to consider feasible options within the Bayside municipality and include them in the assessment of the project for the spoil disposal. Any approvals for the project should extend to include the disposal of large amounts of material on land requiring capping layers or potential stabilisation through extracted quality sandstone materials.

There is a demonstrable public benefit both in terms of:

- Cost savings for transport or material away from the project site.
- The saving or net benefit of not needing to import spoil at a later date for projects.
- Potential public benefit through minimal expenditure in relation to the total project size.

- The alternative or additional spoil reuse options should not be left for the construction contractor to negotiate or progress given that the proposed 1.4 million cubic meters of spoil becomes a designated development under the EPA Act, and requires specific approvals for placing the material and requires specialist strategic planning and engineering advice to enable it's reuse in surrounding land areas. The use of these areas, the identification of these lands should be a key criteria for spoil disposal as an option for the F6 extension to maximise the public benefit that can be achieved and minimising the impact on surrounding communities.
- Council notes the waste management levy is a significant consideration in relation to the storage and use of spoil in a project of this size.

## 11. Traffic Impacts

The project will redistribute traffic on the road network, with over 10,000 cars exiting onto President Avenue in Kogarah. There are numerous proposed changes to the local road network/access, some of which Council does not support and further consultation is sought with RMS.

### President Avenue

*As noted in the EIS:*

The proposed changes to local access along President Avenue include:

- O'Neill Street converted to a cul-de-sac at President Avenue with access gained via Crawford Road.
- Lachal Avenue converting from a one-way northbound to a two-way operation.
- Traynor Avenue right turn in removed so left in only. Alternate access via Lachal Avenue.
- Oakdale Avenue no change.
- Moorfield Avenue to become a cul-de-sac with access to Moorfield estate via Civic Avenue or Oakdale Avenue.
- Civic Avenue right turn option to/from President Avenue removed. Left in/left out only.

### Council Response

- O'Neill Street conversion to a cul-de-sac has not been presented to Council for discussion. A left in and left out access would be preferred to be maintained for O'Neill Street but it is acknowledged that the changes in level may not allow for this to be possible. Access to memorial playing fields, tennis courts, and car park through Sybil Lane will be impacted. Local residents and Brighton-Le-Sands Public School must be consulted on the proposed change by RMS and Council be involved as an interested party in the process.
- Lachal Avenue's proposed 2-way conversion is not supported as it will lead to loss of all parking in the street due to its narrow width of only 7.2m. This is a loss of amenity for residents in addition to extra traffic movements. Access for Moorefield Estate for residents turning right out is not considered safe or adequate from Lachal Avenue as the opportunity to make the right turn with the proposed F6 increase in traffic will be extremely limited.
- Moorefield Avenue's conversion to a cul-de-sac is not supported. Left in-left out access must be maintained to avoid unnecessary circulation of local traffic along Annette Avenue. Council sees no safety benefit derived from preventing left in and left out movement.



- Civic Avenue's proposed left in/left out only is not supported by Council. The preferred option is for a signalised intersection to accommodate safe right turning movements into and out of Moorefield estate. A right turn holding lane can be provided to minimise impact on traffic along President Avenue. Civic Avenue is sufficiently wide for this treatment and will have minimal impact on residents, parking and amenities and provide access to residents. Along with traffic signals, Council would also like additional traffic calming measures installed in Civic Avenue and Marshall Street to make this route less attractive as a shortcut for southbound vehicles between President Avenue and Rocky Point Road.

#### Moorefield Estate - RMS Community Traffic Meeting Outcome

- Council supports the consultation held 28 November 2018 for the Moorefield Estate, St George School, TAFE, James Cook High School and Moorefield Girls School.
- The RMS intersection designs for the President Avenue Option B discussed at the meeting should consider the following:
  - Allow access to the F6 extension tunnel from the Moorefield Estate.
  - Design the right turn holding bay from Civic Avenue into President Avenue travelling east with sufficient length to allow vehicles to merge safely.
  - Community consultation should be undertaken if there is any proposed loss of parking on Civic Avenue.
  - Community consultation, including with the businesses, should be undertaken regarding the loss of parking on President Avenue with the future introduction of morning and afternoon peak hour clearways.
  - Load limit restrictions should be considered for the Moorefield Estate streets to prevent heavy vehicle through traffic.
  - Bus access into Lachal Avenue for St George School students should be maintained and considered in future road network designs.
  - The change in level at the intersection of Traynor Avenue/Annette Avenue should be considered in future road network designs.
  - Consider the uses of 'Keep Clear' markings on President Avenue at Lachal Avenue under the Option B proposal.
  - The footpath width at President Avenue/Princes Highway intersection must not be reduced to allow road widening. The local schools and TAFE in the local area means there is high pedestrian traffic using these footpaths.
  - Community consultation process by RMS/F6 project managers must be undertaken with local residents affected by proposed changes.
  - Investigate opportunities to increase safety at the Marshall Road/Rocky Point Road for vehicles exiting the Moorefield Estate.
  - Investigate the current change "no right turn" from Rocky Point Road southbound.
- A similar RMS Community Traffic Meeting needs to be made available for residents in the Chuter/O'Connell precinct area.

#### Princes Highway/President Avenue Intersection

*As noted in the EIS:*

- Surface works include an additional right turn lane from Princes Highway northbound into President Avenue

#### *Council Response*

- No improvement works are proposed for westbound/southbound traffic. Council has concerns about the delays and queue lengths at the intersection of the Princes Highway/President Avenue and the potential use of Civic Avenue/Marshall Street as a thoroughfare by traffic if the existing intersection configuration performs at less than optimum to cater to the increased traffic from F6. Traffic modelling must provide a comparison for time taken to use the Princes Highway/President Avenue intersection with the existing cycleway vs using Civic Avenue/Marshall Street to travel to Rocky Point Road.
- There are safety concerns with accessing Marshall Street at Rocky Point Road with the existing left-in/left-out arrangement. Marshall Street is too close to the fork of Princes Highway and Rocky Point Road with a sharp left in and an equally difficult left turn out movement due to traffic coming at speed. Expected increase in traffic flow at the intersection will exacerbate current safety concerns. Council wants improvements to this intersection to make it safe for all road users.

#### **F6 Exit to President Avenue**

##### *As noted in the EIS:*

- A tunnel portal and slot structure would be located north of President Avenue within the current Rockdale Bicentennial Park East. The slot structure would consist of north facing ramps with two lanes in each direction.
- Widening of President Avenue to three lanes east and west bound.
- Raising President Avenue about three metres at the location of the intersection with the proposed tunnel ramps.
- Consolidation of street access as previously noted.

##### *Council response:*

Pedestrian facilities have not been provided at the entry/exit of the tunnels at President Avenue. Council has concerns about pedestrian safety, accessibility and connection to Bicentennial Park, Memorial Playing Fields and O'Neill Street without these facilities and Footpath design and construction must provide suitable connection on southern side including additional pedestrian phase on President Avenue at O'Connell Street (on western side).

- A pedestrian phase at traffic signals would be required across Civic Avenue as part of Council's preferred option of Civic Avenue traffic signals.
- Pedestrian phase on President Avenue on the eastern side of West Botany Street traffic signals is required to facilitate access to Bicentennial Park
- A number of properties have driveways east of O'Neill Street on President Avenue. The extent of embankment currently encroaches along these properties and must ensure that their vehicles do not scrape at the bottom and driveway accesses are maintained or reconstructed at no cost to Council or residents if they are adversely impacted.
- Impacts of the proposal on O'Connell Street and Chuter Avenue have not been addressed. Council is concerned about an increase in traffic along this route between Sandringham Street and President Avenue in both directions to access the F6. Council request the speed limit in O'Connell Street/Chuter Avenue to be reduced to 50kmph. Council would also like the provision of traffic calming scheme along the entire length of this route including treatments at the intersections with side streets to make this route less attractive for use as a thoroughfare. The traffic calming scheme designed as part of the delivery of F6 must be in consultation with Council's traffic team.

- RMS are requested to undertake post completion surveys to monitor how the predicted traffic impacts transpire and whether the proposed mitigation measures are effective. These counts are to be undertaken at 12 monthly intervals post completion, for a period of 5 years, with RMS required to implement treatment measures if the traffic conditions have deteriorated.
- RMS are requested to monitor and remediate the road surface impacted during the proposed construction period.

#### General Comment

- Council requests that detailed traffic management plans be prepared that identify:
  - Impacts on local streets
  - Proposed intersection upgrades
  - Proposed clearways
  - Impacts of parking demand and proposed parking offset
  - Impacts on parking for the neighbouring industrial areas
  - Impacts on safety and access to and from the Moorefield Estate precinct
  - Pedestrian and Active Transport Management Plan

## 12. Air Quality

Both the construction and operational phases of the project will impact on air quality. These impacts will impact local residents, users of the sporting facilities and people in the vicinity of the stacks. Council is requesting additional air monitoring stations adjacent to the ventilation stacks and also at O'Connell Street, Monterey.

#### *As noted in the EIS:*

- The reports conclude that all air and odour will meet the NSW impact assessment criterion and NSW Environmental Protection Authority (EPA) Approved Methods for air and odour quality.
- The EIS states that the provision of a tunnel filtration system does not present a feasible and reasonable mitigation measure and is not being proposed. If in-tunnel air quality level could not be achieved with the proposed ventilation system, the most effective solution would be the introduction of additional ventilation outlets and additional air supply locations. This is a proven solution and more sustainable and reliable than tunnel filtration systems.
- Three ventilation outlets are proposed:
  - Outlet E F6 Extension Stage 1 – Location Arncliffe - Exhaust from the northbound F6 Extension Stage 1 Tunnel (Kogarah to Arncliffe)
  - Outlet F F6 Extension Stage 1 - Location Rockdale - Exhaust from the south bound tunnel of the F6 extensions Stage 1
  - Outlet G F6 Extension Section B – Location Rockdale - Exhaust from the northbound tunnel of the F6 Extension Section B (future Kogarah to Taren Point Road stage)
  - With both the construction and operation of Stage 1 there will be an impact on local air.

*Council response:*

- Council seeks additional air quality monitoring stations. These should be provided adjacent to the two proposed ventilation stacks. These monitoring stations should be located at an appropriate elevation to reflect the elevated ventilation outlets design.
- An additional air quality monitoring station should also be located close to O'Connell St, Monterey to reflect the likelihood of significant increase of traffic on this roadway as a result of the proposed motorway.
- Illinden Sports Fields should be identified as a sensitive receptor in terms of air quality if this site has not yet been included
- RMS to provide details of mitigation measures if there is found to be poor air quality adjacent to the tunnel entry/exit and also next to the Illinden Sports Fields.
- RMS should investigate the creation of micro climates around ventilation stacks and sensitive receptors through tree planting to reduce flow of pollutants.
- RMS to develop a Development Control Plan amendment for Council consideration to include design parameters to minimise adverse air quality impacts on potential future development immediately around stacks
- RMS to provide details on what it has learnt from air quality monitoring for WestConnex and the new M5 projects and how these lessons learnt will be implemented for the F6 project.

### 13. Noise and Vibration

During both the construction and operation phases of the project there will be an impact on sensitive receivers, including many which have been identified as highly noise affected. It is important that all affected sensitive receivers have an opportunity to request mitigation measures.

*As noted in the EIS:*

During the construction phase;

- A large number of noise level exceedances are associated with the Arncliffe construction facility (C1) and these will be for a period of two years.
- The Rockdale construction facility (C2) would result in exceedances at nearby receptors, some of which can be categorised as highly noise affected. This will last for around 6 months.
- President Avenue construction facility (C3) would result in exceedances due to the close proximity of residential receptors. Those closest have the potential to be highly affected, with construction lasting up to 27 months.
- Princes Highway construction facility (C6) would result in noise exceedance levels, with most impacted receptors being highly affected, including being affected by noise awaking events. Construction is programmed to last for up to 27 months.

Operational phase

- There will be exceedance of the day time road traffic noise levels for 148 sensitive receptors, of which 105 sensitive receptors are considered eligible for the consideration of feasible and reasonable noise mitigation measures.
- Night time road traffic noise levels will be exceeded for 135 sensitive receptors, of which 90 sensitive receptors are considered eligible for the consideration of feasible and reasonable noise mitigation measures.

- Combined impacts during the day and night time period noise levels will be exceeded at a total of 159 sensitive receptors, of which 107 sensitive receptors are considered eligible for the consideration of feasible and reasonable noise mitigation measures.

#### *Council response*

- Noise mitigation measures need to be identified for the construction phase and all affected sensitive receivers have an opportunity for the installation of mitigation measures.
- The 159 receptors that will exceed both day time and night time noise levels at the operational phase should all have an opportunity for the installation of mitigation measures. A process for organisations/sensitive receivers to request mitigation measures needs to be in place.
- At the operational phase clarity is required as to what the meaning of *feasible and reasonable* is and who determines this? This requires further consultation to ensure that this is an acceptable definition and process.
- Council requests that all affected sensitive receivers have an opportunity to request mitigation measures.
- RMS to provide regular updates to the community of upcoming noise impacts.

## 14. Biodiversity

The project has the potential to have an adverse impact on biodiversity including the ecological significant wetland corridor through Bicentennial Park and Scarborough. Council seeks further consultation with RMS to consider alternate designs and mitigation measures.

#### *Vegetation*

##### *As noted in the EIS:*

- The project would require the removal of native vegetation, including 237 native trees of which 41 trees that have high retention value.
- The project would involve the removal of 20 adult Magenta Lilly Pillies, an identified NSW Threatened Species. These are planted in lines within landscape plantings at the Rockdale Bicentennial Park and they would not be offset in accordance with BAM as they are not part of a known naturally occurring population.

#### *Council's response*

- Removal of trees (particularly hollow bearing) will result in habitat loss for numerous fauna species in an area already lacking tree canopy. Delivering biodiversity offsets do not take into account the fragmentation of habitat and does not prevent the ongoing decline of biodiversity values within the LGA.
- RMS must work with Bayside Council to identify a replacement program that can increase urban tree canopy and enhance biodiversity connectivity within the LGA.
- In relation to the Magenta Lilly Pilly, the Rockdale Biodiversity Strategy has identified other Magenta Lilly Pilly species around Hawthorne Street Natural Area and Bardwell Valley Golf Course. As a result Bayside Council requests RMS to include a biodiversity offset of these Magenta Lilly Pillies.
- In relation to the management and mitigation strategies to protect biodiversity within Scarborough and Bicentennial Parks note Council's mapping has identified within the Bicentennial Park and Scarborough Park North precinct:
  - Vegetation communities inclusive of:

- Alluvial bangalay forest
  - Revegetation areas
  - Swamp paperbark scrub
- Threatened fauna habitat for:
  - Green and golden bell frog
  - Potential for grey-headed flying fox
- Significant flora location for:
  - Bangalay sand forest
  - Estuarine reed land
  - Swamp oak floodplain forest
  - Swamp sclerophyll forest
  - Sydney Freshwater Wetlands
- Key fish habitat
- Therefore the RMS needs to work closely with Bayside Council to identify and implement mitigation measures to reduce the impact to these biodiversity traits

#### Terrestrial Fauna

##### *As noted in the EIS:*

- Approximately 4.45 hectares of potential foraging habitat for the Grey-headed flying fox (which is listed as vulnerable under the Biodiversity Conservation Act 2016 and the Environmental Protection and Biodiversity Conservation Act 1999) will be removed.
- Approximately one hectare of native vegetation would be offset through the ecosystem credits
- The monitoring undertaken for the Green and Gold Bell Frog (listed both at the State and National as a threatened species) population at Arncliffe indicates the population is in decline since 2016. The project would delay the reinstatement of habitat at the Arncliffe construction site facility (part of the new M5 Motorway requirements, which includes a program of captive breeding and new habitat creation at Marsh Street)

##### *Council response*

- The project will remove 4.45 hectares of habitat it is requested that all loss of potential habitats be reinstated for the Grey-headed Flying-fox within the local area with a focus on winter food species. This is to be undertaken in collaboration with Bayside Council.
- Given that the region already has vulnerable populations of the Green and Golden Bell Frog, it is requested that pilot habitats be established and managed by RMS similar to the Eve Street, Arncliffe undertaken for the new M5. This is to be undertaken in collaboration with Bayside Council. Bayside Council has the expectation that RMS will install an environmentally appropriate (including outside of endangered ecological communities/wetlands) shared pathway within Scarborough and Bicentennial Parklands that showcases the biodiversity values of the area including signage and viewing points.
- The project does not adequately identify mitigation strategies to minimise / prevent disturbance or physical impact to waterbirds.

#### Aquatic Biodiversity

##### *As noted in the EIS:*

- There would be potential temporary impacts on Wetlands within the Rockdale Bicentennial Park through Rockdale Wetlands and Scarborough Park North.



- Minor impacts are expected to Muddy Creek upstream of Bestic Street due to a small increase in impervious area and through the removal or requirement for shading of Common Reed around stormwater channels leading to Muddy Creek.
- The Cooks River would be directly impacted as the water treatment plant at Arncliffe would discharge to the Cooks River. However, this is unlikely to alter the hydrological character as it is a large tidal river.
- Species currently inhabiting the pond are likely to be those tolerant of urban pressures, such as poor water quality.

*Council response:*

- RMS as part of its consultation with Bayside Council discussed the Kings Road Wetland and its restoration. This issue is not addressed in the EIS. Council therefore requests the EIS needs to address how the F6 Project will improve the environmental condition of Kings Rd Wetland as well as improve community access to this open space
- Further information is required from the RMS on the proposed F6 works to improve or at a minimum maintain water quality within the Bicentennial and Scarborough park wetlands, particularly in light of the key fish habitat at Tonbridge Creek which is recognised as important fish breeding habitat for Botany Bay. This is particularly important given that no mitigation measures have been proposed, nor any plans to ensure that the aquatic environment remains habitable. It is expected that RMS will liaise with Bayside Council to address these issues.
- As a minimum Council requests that a Wetland Environmental Management and Maintenance Plan is developed for this project and to include details on
  - Protection of threatened species and endangered ecological communities
  - Protection of other native vegetation communities, and flora and fauna
  - Protection of terrestrial and aquatic habitat
  - Protection of migratory species
  - Inter-relationship between the motorway and the surrounding natural area
  - Impact of development on ecological significance of the area
  - Measures to reduce adverse environmental impact
  - Management of pest species (plant and animal) during and post construction

#### Ground Water Dependent Ecosystems

*As noted in the EIS:*

- Ground water modelling indicates there will be long term surface water draw down for the Rockdale Wetlands and that the tunnel construction will result in lowered water tables. The EIS considers that the potential impacts will be low.

*Council response:*

- Bayside Council seeks further clarification from RMS to provide details across all the groundwater dependent ecosystems, including details on the methodology and relevant management strategies to mitigate the impacts on the natural environment including Landing Lights Wetlands, Marsh St and Bicentennial and Scarborough Ponds which contain number of endangered ecological communities and threatened species habitat.

## 15. Landscape and Visual

The project will have an impact on the landscape character and visual amenity and a number of sites, including the loss of 449 trees. Council seeks further consultation with RMS to ensure an agreed strategy to minimise this impact both during and post construction.

*As noted in the EIS:*

Construction phase:

- The northern surface works (Arncliffe area) will have a minimal impact on landscape character and also minimal day and night time visual impacts.
- The southern surface works (Rockdale, Kogarah and Brighton-Le Sands) will have a high-moderate impact on the landscape character of Rockdale Bicentennial and Scarborough Parks and moderate to low impact on the Princes Highway commercial centre and Muddy Creek open space. There will only be a low impact on the remaining landscape characters.
- The southern surface works will have a high-moderate visual impact on views to the tunnel portal, entry and exit ramps and the President Avenue intersection. Moderate visual impacts include views north from Colson Crescent, view south from open space at Brighton-Le- Sands public school, views east along president Avenue from Princes Highway and view south from West Botany Street.

Operational phase:

- The northern surface works will have negligible to moderate-low (this being the view north from Eve Street Cycleway) impact on landscape character and visual impact.
- The southern surface works will have a high-moderate impact on the landscape character for Rockdale Bicentennial and Scarborough Parks and a moderate –low impact on the Muddy Creek open space.
- The southern surface works will have a high-moderate visual impact on views to the tunnel portal, entry and exit ramps and the President Avenue intersection. Moderate visual impacts include views north from Colson Crescent, view south from open space at Brighton-Le- Sands public school, views east along president Avenue from Princes Highway and view south from West Botany Street.

#### *Council response*

Landscape character and visual mitigation strategy

- Northern surface works - Landscape character impacts:  
A further View point location for consideration would be that from Valda St Reserve at the end of Valda St adjoining Marsh St where a local hierarchy playspace is currently located. An analysis of this area should be undertaken.

Southern surface works - Landscape character impacts:

- View from the Brighton -Le-Sands Public School, Brighton Memorial Reserve fields and playspace are considered to be affected by the degree of loss of trees including significant /high value trees within Bicentennial Park despite the retained vegetation to the west of the fields. An analysis of this area should be undertaken.

NOTE - Rockdale Memorial Fields frequently referred to in the EIS is named Brighton Memorial Fields /Reserve.

Southern surface works area (President Avenue)

- Further current passive recreation use areas /Viewpoint locations (Figure 13-22) which could be affected are the existing off-leash dog area off Civic Avenue, Colson Avenue playspace, Moorefield Reserve playspace and Victory Avenue playspace (Beach St, outside of the F6 construction footprint). A view analysis of these areas should be undertaken.

#### Landscape Comments

- Figure 13-40 of the EIS shows 'Trees that would potentially be removed and their assessed value – southern surface works'. The EIS does not identify how the trees within Bicentennial Park are to be protected throughout the construction period and subsequent close down of Bicentennial Park precinct. Council therefore requests RMS collaborate with Council and provide information on the proposed tree protection zones.
- The EIS identifies the loss of 449 trees in total. Many of these have been recorded as having a HIGH assessed value. No discussion has been held with Council on this matter, with such high number of trees to be removed to have an adverse impact on tree canopy cover. Collaboration with Council is required and replacement must be planned in consultation with Council.
- Landscape treatments - Supplementary tree planting and screening to be provided along President Ave to offset tree removal and re-establish a visual screen along the corridor and also at tunnel portal and entry and exit ramps to comply with dot pints provided below.
- It is considered that preparation of any comprehensive tree report should be conducted by an independent team of highly experienced and qualified arborists in consultation with Bayside Council.
- All endeavour should be made to protect trees through the construction period for retention ongoing, particularly in respect of significant /high value trees on the site.
- Replacement of any trees lost should be at a ratio of no less than 1:5 to ensure succession.
- Reinforcement plantings of canopy trees along the construction footprint early in the project would assist both succession and screening of the work site.
- Any replacement plantings should target an increase in tree canopy and aim to enhance Bayside Council's position in respect of the Sydney Green Grid.
- A minimum 1 year maintenance defect period to be established post project completion to ensure establishment of new plantings.
- Consideration of strata vault systems or similar where plantings are likely to impact over long term on other assets.
- Future maintenance of landscape works to be considered in the design process to ensure ongoing maintenance is minimised.
- Issue is raised as to how reconstruction of section of the wetland system at completion of F6 works will affect the remainder of the wetland system and its environmental stability - also the construction period will affect the wetland system?
- Key active recreational facilities within Bicentennial Park to be impacted by the works also include a large community events open space area, picnic and BBQ facilities and car parking, to be acknowledged in re-instatement of level of amenity.

#### Options for relocation of assets from Bicentennial Park

- As highlighted previously to better understand the potential impacts of the F6 on the community assets in Bicentennial Park precinct the RMS has agreed to fund a Recreation Needs Analysis and will be jointly managed by Council and RMS. This study has commenced and will identify ways in which the impacts can be mitigated and compensated. Interim feedback has been provided to RMS on temporary impacts and permanent impacts. The Recreation Needs analysis will be provided to the Depart of Planning and Environment when complete.

- President Avenue Pedestrian Bridge Design - to promote public art and community ownership of our public infrastructure, it is requested that public art be included in the design of the Bridge.
- Council would like further information on the future design on President Avenue. Council requests RMS to provide street sections (building line to building line) to understand the location of the indicated tree planting, the width of the footpath, front setback to provide further comments.
- Both the proposed construction and final infrastructure of the motorway (including ventilation stacks) will impact on the visual amenity, connectivity and functionality of the local area. Consequently:
  - The F6 project should take into consideration urban design from the early planning stages, concept designs to the details of the final infrastructure, such as pedestrian bridges.
  - The architectural design of the proposed ventilation facilities on West Botany Street should be well integrated with the surrounding built form and streetscape. The proposed development should refer to Council's Design Review Panel and the Council's Strategic Planning department for comments.
  - The design of the tunnel portals should see as an opportunity to create a significant landmark. The design principles should include creativity, innovation but should respect the wetland context and be legible and straightforward in form.
  - The design of the President Avenue Shared Cycle and pedestrian Bridge should see an opportunity to create a piece of functional as well as a significant visual feature which sits within the built and natural landscapes. The design principles should include capitalising the views to the Bay, enhancing the visual connections between the green wetland and Scarborough Park North, which will add visual interest and identity to the environment.
- Council request the establishment of an Urban Design Panel to review design of temporary and permanent infrastructure.

## 16. Property and Land Use

RMS has notified Bayside Council of intended land acquisitions and the timing and of these acquisitions need to be discussed with Council to ensure the required works are undertaken in a timely manner. Council also seeks to collaborate with RMS on the future planning for the F6 corridor.

### *As noted in the EIS*

- The project traverses the suburbs of Arncliffe, Banksia, Rockdale, Kogarah and Brighton-le-Sands.
- The project will impact a number of Bayside Council owned properties

### *Council response*

- Bayside Council has been impacted by the F6 corridor since 1951. The future of this corridor is of the utmost importance, given the significant amount of open space contained within it.
- Council notes the comments in the EIS regarding decision to be made in collaboration with Bayside Council and re-iterates the need for its involvement in planning for the future of the land affected by the corridor.

#### Existing and future use of the F6 corridor (14.4.1)

- The form of acquisition of Council owned properties, and timing of these acquisitions should be discussed and negotiated as a first priority.
- It is important that both Council and RMS understand timing and form of acquisitions, to enable works associated with these acquisitions to be undertaken and completed prior to acquisition.
- Council recommends that the first acquisitions be leasehold acquisitions, and the freehold acquisitions occur post construction, to enable the acquisition to accurately capture the as built location of the road/facility.
- Council requests that RMS consider access licences and variation of existing leases, as an alternative to compulsory acquisition for the Arncliffe facility.
- Council note the impending termination of the existing lease for open space at Bicentennial East between Bayside Council (Lessee) and RMS (Lessor). Council seeks assurance that post construction, RMS intend to issue a new lease in perpetuity or transfer this land to Council for ongoing use of the land for open space.

#### Impacts to utilities

- RMS to minimise impacts that service location within Scarborough Park will have. The freehold acquisition of this space should only occur upon completion of the works, to ensure it captures built form.
- RMS to work with Council on the programming of this acquisition, and management of impacts to parking, existing sporting clubs etc.

#### Management of Impacts

- Council requires to understand what the impacts will be on the Bardwell Valley Golf Course parcel of land. This land is owned by Council, and will need to be consulted as part of the planning for these works.
- Council requires to know what form of acquisition this will be, i.e. compulsory acquisition of easement.

#### Environmental Risk Analysis

- As noted previously, Environmental Management upon Council land occupied by RMS is required. RMS will be required to demonstrate environmental management through geotechnical condition assessments undertaken prior to and prior to hand back of the land.

## 17. Social and Economic

Social and economic impacts have been identified. It is therefore important for Council to have continuing consultation with RMS in the preparation of a Business Management Plan, Community Communication Strategy, Construction Fatigue Protocol and the Community and Social Management Plan. Construction fatigue in particular is a matter of concern as it is known to have a detrimental impact on human health.

#### *As noted in the EIS:*

- 12 full property acquisitions and three partial acquisitions will be required.
- Direct impacts on social infrastructure include acquiring a partial strip of TAFE NSW St George for road widening, 1.1 hectares of Bicentennial Park, 0.5 hectares of Scarborough Park North and 0.7 hectares of Kogarah Golf Course.

- Temporary partial leases during construction include Kogarah Golf Course, Rockdale Bicentennial Park (468 West Botany Street, Rockdale), 17 Bermill Street and Scarborough Park North (112-132 President Avenue and 137 President Avenue).
- During construction there will be:
  - Traffic impacts on the socio-economic environment range from low to medium-low for all construction sites.
  - Noise and vibration impacts on the socio-economic environment have been identified as high (the exception being in the vicinity of the Arncliffe construction site).
  - Air quality and odour impacts on the socio-economic environment have been identified as high (the exception being in the vicinity of the Arncliffe construction site).
  - Urban design and visual amenity impacts on the socio-economic environment range from low to high (construction site C3 at President Avenue).
  - Impacts on local businesses relying on passing trade and parking are considered moderate. Impact on servicing and deliveries could be high-moderate. Impact on amenity is variable depending on the nature of the business.
- Construction fatigue is likely to be experienced in the areas around the Arncliffe construction site (C1), the Rockdale construction facility (C2), President Avenue construction facility (C3), pedestrian and cyclist path east (C4) and west (C5), and the Princes Highway/President Avenue intersection upgrade.
- Operational impacts on the socio-economic environment is likely to be low to moderate with the exception of the President Avenue intersection site where the impact has been identified as high.
- It is noted that RMS will be undertaking condition assessments of properties that may be impacted by tunnelling.

#### *Council Response*

- Council seeks to review the proposed measures to be implemented by RMS to mitigate the impacts the F6 project will have on businesses, residents and the community (traffic calming, parking, noise, air quality etc.).
- Council supports the preparation of a Community and Social Management Plan, however this plan should be prepared prior to the construction phase rather than the operation phase of the project. The local community will be impacted by the project during the construction phase, it is therefore necessary to prepare the Community and Social Management plan at this point in the project.
- Council seeks the opportunity to provide input to the development of the Business Management Plan, Community Communication Strategy, Construction Fatigue Protocol and the Community and Social Management Plan when they are developed. The Community Communication Strategy should include measures that update residents and local businesses about any changes to the project (for example delays) and provide them with an opportunity to seek further information about the project.
- Construction fatigue has been identified in the EIS for communities around most of the construction sites. Council seeks:
  - A requirement for a utilities manager with enforcement powers be appointed to coordinate project and utilities works so that cumulative construction impacts on residents around worksites are minimised.
  - Measures to require the dissemination of community information, adequate lead times for notices and immediate availability of all notices on the proponents website.



- That all Council assets within the identified zone have a condition assessment undertaken. Bayside Council is to have the opportunity to have input into the assessment of Council assets.
- That Council is kept updated of the number and location of properties that are found to be impacted by tunnelling.
- That all property owners are regularly informed of the process and support that will be provided by RMS

#### Kogarah Golf Course

- RMS are to demonstrate how they plan to work with the Kogarah Golf Club (KGC) to mitigate the impacts of the project, considering noise, air quality, ongoing loss of part of their course, loss of membership.
- RMS to work with Council on the re-instatement of the Council community land post works. This land is currently affected by a 'Charitable Trust', permitting the usage upon the land to being road over recreation. Council would like to work with RMS to have the road purpose removed post completion of the proposed leasehold in late 2024. This will enable the land to be used for open space and recreation into perpetuity.

#### Bardwell Valley Golf Course

- Council request a detailed scope of works to be undertaken upon this land, including the form of acquisition required, i.e. easement.

#### Access and connectivity impacts

- Parking spaces will be lost as a result of the F6 project. This will impact on remaining sporting fields, such as Bicentennial South.
- Council would like to review and comment on the Construction Traffic and Access Management Plan (CTAMP) to ensure we are across the management of these parking issues and the mitigation of the issues.

#### Social infrastructure

- Council will work with RMS on the concept design for urban design and landscaping works at Bicentennial Park.
- Council would like to include works upon Brighton Memorial playing fields to ensure re-instatement of all playing fields. We would like to work with RMS on finalising the concept plan for this site.

#### Muddy Creek Ground Settlement

- The ground settlement of Muddy Creek concrete channel is a concern, given the Sydney Water project commencing concurrently with the F6 project.
- Council would like for RMS/Sydney Water and Council to talk about the impacts the F6 project may have on the stormwater channel and to develop strategies to mitigate these impacts.

#### Management of Impacts – Community and Wellbeing

##### *Amenity*

- Council to provide feedback on the Site Establishment Management Plan, prior to being adopted to ensure appropriate measures have been considered

##### *Social Infrastructure*

- Council would like a detailed scope and program of works to be delivered, showing the establishment of relocated sporting fields prior to construction.
- Council to provide feedback on the Community and Social Management Plan prior to adopting

#### *Community consultation*

- Council to provide feedback on the Community Consultation Strategy, prior to being adopted.

#### *Impacts on Business*

- Council to provide feedback on the Business Management Plan prior to adopting

## 18. Surface Water, Flooding and Ground Water

The construction of the F6 project will increase the potential for flooding and impacts to water quality, surface water and ground water. It is important that Council is provided with the requested information at the detailed design stages and that further assessment of the issues raised is undertaken.

#### *As noted in the EIS:*

- Potential construction impacts on surface water have been identified including the potential displacement of water due to blocking effects of the construction sites and the potential increase in peak flood levels at 32 properties.
- Potential impacts on surface water at the operational phase include:
  - Increase in base flow and water quality for the Cooks River
  - Increase in storm water runoff volume for Rockdale Wetland and Northern Scarborough Pond
  - Mobilisation of sediment and scour to Rockdale Wetland, Northern Scarborough Pond and Cooks River
  - Impacts to the hydrological regime for Rockdale Wetland and Northern Scarborough Pond
  - Impacts to water quality (increased turbidity, lower dissolved oxygen levels and nutrient increases in toxicant concentration, increased alkalinity).
- Potential operational impacts on flooding include:
  - Potential increase in peak levels in the open space of the Kogarah golf course and the road reserve of marsh Street by 11mm.
  - Potential increase in peak levels in two residential properties in West Botany Street by 120mm.
  - Potential increase in peak levels along West Botany Street by a maximum of 20mm.
- Potential impacts at both the construction and operational phases on the groundwater include reduced ground water recharge, tunnel groundwater inflow, groundwater level decline in groundwater quality and ground settlement.

#### *Council's response*

##### *Flooding*

- Council requests the flood management strategy which will be completed as part of the detailed design stage shall be provided to Council. Detailed design of the mitigation measures shall be provided.
- All flood mitigation measures (construction and operational stages) shall be incorporated in the flood model and flood mapping shall be updated once this information is available. Revised flood maps shall be provided to Council in GIS (grid/Ascii) file format for review.

- Section 6.1.4 indicates that compensatory flood storage can be provided to offset the combined effect of the President Avenue tunnel portal and surface works, Princes Highway and President Ave intersection upgrade. These storage areas shall be included in the updated flood model at detailed design stage.
- Section 6.1.4, Table 6 – 3 stated that proposed transverse drainage XD01 will increase the 1% AEP flow by 5.7m<sup>2</sup>/sec. While Council supports the increased capacity of the transverse drainage under President Avenue, an appropriate energy dissipation outlet structure shall be designed to avoid downstream erosion.
- There is an opportunity to provide new drainage network along President Lane and connect it to the proposed new drainage infrastructure (adjacent to the proposed water quality basin). This has potential to reduce flooding in O'Neill Street. We seek that RMS investigates this option.
- It is indicated that the cumulative impact of the new M5 motorway, F6 Stage 1 and future stages of the F6 extension may have a significant effect on flooding. It is recommended that a concept future F6 extension around President Avenue be considered to identify cumulative impacts and future flood mitigation measures.
- Ensure where Council stormwater infrastructure is modified by the works during and post construction alternative infrastructure is constructed that mitigates any increase in flooding. Council shall be consulted on the detailed design of this stormwater infrastructure.
- Ensure the existing major stormwater pipes on the eastern side of the Bicentennial Park Ponds are retained or alternate measures installed during the construction to maintain stormwater flows.
- Identify in collaboration with Council opportunities to improve water quality which may include the installation of a deep curtain wall along the eastern boundary of the Bicentennial Park to stop leachate flowing into the ponds.

#### *Surface Water*

- The surface water balance in Table 6-1 and 6-2 preliminarily indicates the impact to the surface discharge volume due to the proposed new M5 Motorway and F6 stage 1 construction. Detailed assessment of the surface water management and discharge system shall be forwarded to Council once designed.
- Detailed design of water treatment facility and monitoring system and maintenance schedule shall be forwarded to Council once available.
- The impact of adding treated ground water into wetlands should consider the risk of this addition impacting the thermal stratification. Groundwater may require thermal adjustment and addition to the top or bottom of the wetlands to minimise the risk of negative impacts.
- Where constructional and operational plans require discharge via Council's stormwater network system, an assessment of the drainage system shall be undertaken to identify the capacity of the system to avoid local flooding and erosion. There may be an impact on asset capacity and the condition of the asset should be considered by RMS prior to assumption that the asset has capacity.
- Council notes installation of new GPTs and seeks clarification that these will be maintained by RMS or funding provided to Council for ongoing maintenance.

#### *Ground Water*

- Council requests that as part of the detailed design information is provided to Council on settlement associated with dewatering. Of particular interest is how settlement will impact on the Council stormwater asset, Spring Street Drain, (a concrete lined channel) located above the area with the greatest expected groundwater drawdown and settlement.
- Council requests survey and monitoring of the Spring Street open channel to evaluate if settlement is impacting the condition of the asset. Remediation will be sought from RMS if an impact is observed.
- The draw down associated with Rockdale / Scarborough ponds, Landing Lights wetland and Marsh St wetland and should be monitored. This will require surveying the wetland wetted area extent prior to works and following construction. The extent of the potential draw down should be plotted (rather than just a depth provided) to better identify the impact (reduced area of shallow ponds may have large impact on pond extent with only small decrease in groundwater level). This will have a large visual impact and impact on biodiversity that relies on the ponds.
- Council supports the appropriate reuse of treated groundwater on sports fields and open spaces to increase return to ground water and reduce the impact on stormwater system.
- Council requests to be informed of the final arrangements for treatment and reuse during the detailed design.
- Council notes that the pH sampling was impacted by cement grout in bores and this should be resolved prior to works commencement to ensure accurate baseline water quality samples are available.
- Council requests to be informed of discharge water quality by way of exception reporting.
- Drainage blanket design at President Avenue, Council is interested in the detailed design which should consider the impact on trees in the park not being able to access groundwater.
- Recommend closer spacing of groundwater flow meters than 1km centres. Assessment of the issues will be difficult to determine with such a distance between flow meters.
- Note risks associated with potential acid sulfate soils, which will be managed under a Construction Soil and Water management Plan. Forward to Council detail once available.
- Council has provided RMS with a detailed report on water quality for Bicentennial Park Ponds and Scarborough Ponds and seeks to work closely with RMS to identify works to improve water quality as part of these works.

## 19. Non-Aboriginal heritage

The F6 project will have an impact on two heritage items. It is considered that they can be managed appropriately.

#### *As noted in the EIS:*

- There will only be an impact upon two items heritage items within the vicinity of the proposed F6 extension. These being:
  - The Patmore Swamp, which is part of Scarborough Park, will be lost through the construction of a shared cycle and pedestrian pathway.
  - The Kings Wetland through the removal of part of the vegetation to create a haul road during construction. The affected area has been modified since 1940 and is not considered to be the most significant part of Kings Wetland. The pathway will

provide access to the park and is considered to be an acceptable impact. The impact to significance will be mitigated by rehabilitating the site after the construction works are completed.

*Council response:*

A Statement of Heritage Impact has been submitted which meets the statutory requirements.

- Chapter 7 of the Statement of Heritage Impact contains a number of management recommendations and should be adopted as the minimum standards for management.

## 20. Aboriginal cultural heritage

There has been consultation with the Metropolitan Local Aboriginal Land Council and no objections have been raised.

*As noted in the EIS:*

- No Aboriginal archaeological sites or objects or areas of potential were found during an archaeological field survey of the study area. It was acknowledged that the area of the swamps would have been utilized as a resource by Aboriginal people in the past. The high degree of disturbance has removed any archaeological potential. The Metropolitan Local Aboriginal Land Council prepared a report as part of the consultation process which indicated that whilst the area had been previously well used by Aboriginal people they had no objection to the development.

*Council response:*

- Ongoing consultation with the Metropolitan Local Aboriginal Land Council should occur throughout the F6 project.

## 21. Climate change and greenhouse gas

The F6 project will result in increased energy consumption. It is considered that the EIS has not adequately considered opportunities to increase the use of green sourced energy and measures to reduce the heat island effect.

*As noted in the EIS:*

- The above ground infrastructure, including tunnel interchanges, surface road upgrades and project buildings are likely to be subject to a number of climate impacts such as solar radiation, rainfall, storm events (flooding) and urban heat island. The sub surface infrastructure will not be as impacted.
- Electricity consumption on site has been identified as a significant portion of its Green House Gas emissions.

*Council response:*

- Council requests RMS use green sourced energy during construction and operation phases.
- The EIS should indicate opportunities where the project could be using alternative sources of energy (solar lights, signage) and GHG emissions reduction opportunities that arise from the project construction.
- Information as to whether modelling of the soil ground and surface temperature with and without F6 being built has been modelled and how any impacts can be mitigated.

- RMS has not identified measures to ensure associated surface infrastructure, including tunnel interchanges and project buildings, have minimal impacts on the heat island effect. Bayside Council would propose that these measures should include an increase in tree canopy within the project boundary and tree canopy increase along President Avenue as per the Eastern District Plan for Sustainability in relation to increasing urban tree canopy cover and delivering Green Grid connections

## 22. Sustainability

*As noted in the EIS:*

- The Future Transport Strategy 2056 as a 40-year vision to use transport to contribute to long-term economic, social and environmental outcomes as well as contribute to the NSW Government's aspirational target to achieve net-zero emissions by 2050.

*Council response:*

- Bayside Council would like to understand how NSW Government with Transport for NSW and RMS aim to adopt more sustainable construction methods over that period of time in order to achieve net-zero emissions by 2050.
- The EIS needs to identify the measures to ensure associated surface infrastructure, including tunnel interchanges and project buildings, will support the NSW Government's goal of achieving a pathway towards net-zero emissions by 2050 as per Eastern City District Plan for Sustainability.

## 23. Brighton-Le-Sands Masterplan

Council is preparing a draft Brighton-Le-Sands Masterplan in order to holistically consider a range of issues and the relationships between them to inform the future planning and design of the area. The Brighton-Le-Sands masterplan will provide a vision, a spatial framework and strategies to guide the future development and public domain improvements of the area. It also allows incremental change that is aligned with the current and future needs of the community. The draft Masterplan is anticipated to be released for public exhibition in early 2019.

The key goals of this project will:

- Review the existing urban planning framework (i.e. land use and urban design specifications) for the area, and where necessary recommend changes to reflect current government, Council and community aspirations. F6 Extension project
- Discuss with the community and stakeholders opportunities/expectations for the Brighton-Le-Sands public domain, tourism, and future developments.
- Holistically consider a range of issues and the relationships between them to inform the planning and design of the area, including:
  - economic vitality, businesses and tourism
  - a variety of transport modes including pedestrians, cycling, public transport and vehicles
  - amenity, safety in the public domain area
  - urban character and identity of Brighton-Le-Sands
  - environmental issues such as flooding, WSUD and biodiversity
  - social inclusion and equity
  - form based plan



Similar opportunities have been identified in F6 project so that Council would like to work with RMS to further develop the dot points below.

- The Grand Parade - The proposed F6 Extension aims to divert existing heavy traffic away from The Grand Parade. The Grand Parade is currently classified as State Road, owned and managed by RMS. Council would like further information about the vision for the future Grand Parade. Council requests that RMS scope the opportunity to reduce traffic lanes, extend footpath on the western side, provide and transform The Grand Parade into a pedestrian-friendly, green, increased access point to the beach and vibrant beachside Avenue.
- Bay Street - The proposed F6 Extension aims to divert existing heavy traffic away from Bay Street. It is currently the main shopping street at Brighton-Le-Sands. However, the centre suffers from a high volume of traffic and noise. Bay Street is presently classified as a state road, owned and managed by RMS. Council would like to discuss with RMS their vision for Bay Street. In particular Council requests that RMS scope the opportunity to reduce traffic lanes, extend footpath, provide a separated cycle lane, provide and transform Bay Street into a pedestrian/cycle friendly, urban and main street character type of streetscape.
- Opportunity for amenity improvements for East-West Streets - Council supports the opportunity identified (Appendix C page 96) to facilitate a comfortable shaded environment for bicycle and pedestrian east-west links to connect Botany Bay and other major centres. It also aligns with the opportunity that Council has identified in the Brighton-Le-Sands Masterplan. This might include zoning changes and funding mechanisms. Council requests a meeting with RMS to further discuss the nominated amenity improvements/ possible delivery methodology for East-West streets.

Council would like to acknowledge the consultation already undertaken by RMS in regard to the F6 Project, with the establishment of the RMS Stakeholder Liaison Group, Council Technical Working Groups and with the community. This submission has identified a wide range of matters that require further assessment and Council seeks to work collaboratively with RMS to address these matters prior to any determination of the F6 Project by DPE.