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Daniel Gorgioski
Planning Officer
Regional Roads | Transport Assessments
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001
E daniel.gorgioski@planning.nsw.gov.au

**Submission: State Significant Infrastructure Application (SSI 6878) Yallah to Oak Flats
Princes Motorway Extension (Albion Park Rail Bypass) – Submission and Preferred
Infrastructure Report (SPIR)**

Dear Daniel

Thank you for the opportunity to comment on the exhibited Submission and Preferred Infrastructure Report (SPIR) for the Albion Park Rail Bypass State Significant Infrastructure Application (SSI 6878). Council continues to offer its qualified support for the Project, noting that a substantial amount of additional information has been forwarded to Council to comment on and that the concept design has been substantially amended and these amendments, as well as outstanding issues from the original design, affect the Council and its broader Community as key stakeholders.

As a result, Council advises that the State Significant Infrastructure Application, as submitted for the Project, should not be approved by the Department until the outstanding issues are considered and assessed.

The Department should also note that the exhibition of the application took place during the caretaker period and the subsequent local government elections for both Shellharbour City and Wollongong City Councils. Therefore, the elected body has had no opportunity to formally consider and discuss this important project.

Council officers have reviewed the information provided and would like to make the following comments.

Roads and Maritime Services (RMS) Response to Submission

Attachment 1 of this submission contains a summary of Council's comments on the RMS's response to submissions as contained in the SPIR.

Submission and Preferred Infrastructure Report

According to the SPIR documentation the RMS have reviewed the concept design presented in the environmental impact statement in response to:

- *Feedback from stakeholders*

- *Consultation with the community during the environmental impact statement exhibition period*
- *Submissions received during and following the environmental impact statement exhibition period and*
- *Landowner discussions during the process of property acquisition and adjustment*

The documentation also specifies that as a result of the design review, the RMS refined a number of aspects of the project as exhibited in the environmental impact statement to minimise impacts. The key design refinements proposed comprise of the following:

- *Reconfiguration of the interchange at Albion Park (Central Interchange) to minimise the impact on agricultural land and allow northbound traffic to exit the motorway onto Tongarra Road*
- *Reduction of the project footprint within agricultural land, and provision of additional connectivity across the highway for agricultural use*
- *Refinements to intersection arrangements in response to further detailed traffic modelling.*

Shellharbour City Council wishes to advise that it does not support the revised design, in particular, the decoupling of the connection to the Albion Park By-pass and the relocation of the northbound exit ramp to Tongarra Road. It appears that the impacts on the agricultural lands have been given a much greater emphasis and priority than any other concerns or impacts raised by the Community or Government Agencies during the exhibition. In this regard, the revised design and amendments to the project do not adequately address our concerns which were raised in our previous correspondence.

Importantly, the revised concept design raises a number of additional issues and concerns that Council consider need to be addressed which are outlined in this letter. These additional up to date and informed submissions should form part of any assessment by the Department prior to approval being granted.

Traffic and Transport

Council are opposed to a staged construction of the bypass. In this regard, the absence of the Northern Interchange would reduce the effectiveness of the bypass and force south-bound traffic from significant suburbs of Dapto and surrounds onto the road networks within Shellharbour City Council's Local Government Area.

Council has some serious concerns regarding the proposed redesign of the Central Interchange. The SPIR highlights three concerning flaws with the original TRACKS modelling analysis undertaken for the EIS assessment.

1. Incorrect land use data which was not based on current Department of Planning and Environment projections.
2. Incorrect network geometry items (capacity) applied in certain areas of the model.
3. The TRACKS modelling analysis did not follow accepted methodology and incorrectly distributed traffic flows based on the do nothing model and not the converged 2041 bypass model.

It can be argued that these errors invalidate the conclusions of the EIS and require revaluation. In addition the report identifies a significant traffic impact in Albion Park as a result of the proposed network changes.

The Preferred Infrastructure Options Report Rev 2 discusses the three alternative options developed by Mott MacDonald (MM) to reduce the impact on agricultural land near the Illawarra Highway. This is in addition the preferred RMS option also prepared by MM. The three options are as follows

- Option 1 - Central Interchange at Tongarra Road
- Option 2 - Central Interchange North of Tongarra Road
- Option 3 - Central Interchange – Split North and South Facing Ramps

A Value Management Workshop was held on 28 April 2016 which included representatives from RMS, Mott MacDonald, local councils and other key stakeholders. No substantive traffic assessment or modelling data was provided at the workshop to allow participants to assess the impacts of each option.

Following the workshop the RMS conducted an independent peer review of Option 1 which incorporated; engineering, traffic geotechnical design, flooding, environmental impacts and cost estimates. Options 2 and 3 were not reviewed as part of the process. It can be argued that the process is flawed in that a full review of all options should have been carried out and the result presented to the workshop before making any decision on the preferred option.

The Albion Park Traffic Study carried out for Council in 2006 evaluated several options for the configuration and location of the Albion Park Interchange, one of those being conceptually identical to Option 2. It is interesting to note that Option 2 which is identified as Option 16 in the study is shown as being the preferred treatment to minimise traffic impacts in Albion Park and one which delivers a significant benefit / cost justification for the construction of the Tripoli Way Bypass. However, the RMS has chosen not to fully evaluate the potential benefits of Option 2 which was demonstrated by the Albion Park Traffic Study.

Council request that the RMS be required to fully evaluate the impacts and potential benefits of Options 2 and 3.

The SPIR and Addendum Traffic and Transport Assessment Report (ATR) provide the following justification for design refinement

Changes to the interchange at Albion Park are proposed to reduce the impact on agricultural land, and to eliminate a potential traffic weaving issue that could occur under the environmental impact statement design arrangement.

Due to the impact of the proposed route on dairy lands located to the north of Albion Park, the design was reviewed to determine whether the layout could be improved to minimise the impacts of the route on these lands. The proposed design refinement would result in a reduced impact on agricultural (dairy) land by about 10.3 hectares for the operational boundary and a further reduction of 3.8 hectares for the construction footprint as a result of the removal of the ancillary site AS05. The functionality of the interchange would be maintained with no additional impacts on traffic or flooding. This is discussed further in Section 5.5.1 and Section 5.5.2 of this report.

The relocation of the northbound exit ramp would eliminate a potential safety issue of weaving traffic, which may occur if the entry ramp was to be located closer to the Terry Road exit. The relocation is supported by the revised traffic modelling, as discussed in Section 5.5.1 and Appendix A of this report.

It is interesting to note that the EIS option (refer Figure 5-23 Interchange at Albion Park – Construction) had the northbound off ramp merging into a single lane on the Illawarra Highway

without a weave conflict. In this regard the claim that the Design Refinement addresses a road safety issue is incorrect.

The justifications claim that there will be “no additional impacts” on traffic resulting from the Design Refinement is also incorrect. The ATR shows the following traffic volume increases for the Design Refinement compared to the EIS option (Figure 5-2 Forecast Average Daily Traffic in 2041 Ultimate Year).

- Tongarra Road west of Terry Street up from 9,300 veh/day to 24,300 veh/day a 161% increase.
- Tongarra Road east of Terry Street from up 14,000 veh/day to 29,500 veh/day a 110% increase.

This is in addition to the banning of all right turn movements at the intersection of Tongarra Road and Terry Street which is identified in a footnote.

The SPIR goes onto to claim “*impacts on commercial, industrial and extractive industries land would be consistent with those presented in the environmental impact statement*”. The statement is incorrect, given traffic travelling south on Terry Street will not be able to turn right at Tongarra Road to access the town centre, and traffic travelling north on Terry Street cannot turn right onto Tongarra Road the access the southbound M1 on ramp.

A 161% increase in traffic volume on Tongarra Road and the banning of all right turn movements at the Terry Street intersection is not consistent with the EIS option, fails to comply with the SEARS and is unacceptable to Council.

Council has also identified a revised alternative option for the Albion Park Interchange that it considers worthy of further investigation by RMS prior to determination of the SSI application (**Attachment 2**). This option would address the current “decoupling” of the Tripoli Way Extension with the M1 Extension, thereby, giving a better outcome to the travelling public and Albion Park Town Centre. This option requires specific modelling by RMS’s consultant to confirm that it would indeed deliver Traffic Management outcomes, in particular the improved amenity to Albion Park Town Centre. This alternative option may also enable Council to collaborate on the RMS Design and Construction (D&C) contract tender outcomes, thereby allowing for savings to be realised. This Council suggested option for the interchange is very similar to that shown in the original EIS, however, it eliminates the dangerous “weave” and maximises efficiency.

Council has put an earlier version of this conceptual design to the RMS but it was dismissed as being an option not worthy of further consideration at the same meeting in which it was put, without any specific modelling, analysis or further discussion of that option.

The north bound off and southbound on ramps have been relocated further south and serviced by an extension of Tripoli Way to create a four way intersection at the Illawarra Highway. The intersection would be traffic signal controlled with two approach lanes on each leg. The signals would operate on a three phase cycle, similar to the existing intersection of Tongarra Road and Terry Street.

It should also be noted that the proposed “decoupling” of Tripoli Way by RMS has created uncertainty for both Council and affected land owners in relation to design and property acquisitions for the Albion Park Rail Bypass (Tripoli Way). It should be further noted that Council has embarked on an accelerated land acquisition program in order to facilitate the coupling of the construction of the Albion Park Bypass (Tripoli Way extension) with the Albion Park Rail Bypass, thereby achieving a superior planning outcome, consistent with the infrastructure needs resulting from development in the Calderwood Valley. It should be noted

that this development was approved by the State under part 3A of the Environment Planning and Assessment (EPA) Act.

Road Classification and Assets

The latest addendum to the original EIS model present significant impacts to Council's road network and infrastructure. The changes will require significant changes to the Tripoli Way project, as well as Terry Street and Tongarra intersections, and will greatly affect the sustainability of Council's Delivery Program and serviceability of the surrounding road network. These changes are considered unacceptable to Council. Single property access roads are also of concern to Council.

Other considerations around the ownership and maintenance of these roads, and required ancillary infrastructure and Fit for Future ratios will also need to be accounted for in Council's Long term Financial Planning. There must be agreement on any proposed changes in status of roads and clear handover process including where required bringing roads up to agrees standard, eg Illawarra Hwy north becoming a local road, will this require edge and parking treatment, signage change etc and the clarification of the Princes Highway. These are major issues for Council that are yet to be resolved.

Hydrology and Flooding Assessment

It is noted that Council's adopted Macquarie Rivulet Flood model was not relied upon to assess flood impacts associated with the revised design. Council's Preliminary Draft Flood Model was used instead to provide a direct comparison between the Flood modelling undertaken for the EIS design. However the revised design was run through Council's Adopted Macquarie Rivulet model for the 20year and 100year flood events, and impact maps are included for these events.

It can be seen that overall, the Additional Hydrology and Flooding Assessment report demonstrates that the revised design is very similar in terms of flood impacts as the EIS Design, and has less flood impact than the EIS design in some areas. Flood levels will still go up (in general) across the Macquarie Rivulet floodplain as a result of the project, but not as much as would have if the EIS design were selected.

It is also noted that:

- Although flood impacts at the Taylor Road/Illawarra Hwy intersection are shown to be negligible in the larger (50yr, 100yr, 200yr) events, there are still significant impacts in the 10 year and 20 year event at this location. It is unclear whether RMS intend on managing these impacts as part of the project.
- The airport runway is only impacted upon in 500year and PMF event (the impacts are negligible for more frequent events).
- Without the construction of the Tripoli Way extension, access in and out of Albion Park will still be compromised by the levels of low flood immunity at Taylor Road/Illawarra Hwy intersection and (potentially) at the Greenmeadows detention basin spillway, which will be reconstructed as part of the new East-West link road.
- The northbound off-ramp from the M1 extension to Tongarra Road creates an issue for the motorway, in that traffic will queue at this location during a flood as the exit ramp becomes inundated in flood events greater than the one in 5 year event.

If the Department were of the mind to approve the proposal, Council would like the following Conditions of Consent considered:

Prior to Construction:

- An updated "Hydrology and Flooding Assessment" Report is to be prepared. This report is to utilise flood models as prepared during the Final Adopted Macquarie Rivulet

Flood Study (2017) and Final Adopted Horsley Creek Floodplain Risk Management Study (2017). This report is to confirm the final flood impacts of the project

- Further investigation of flood mitigation options at the general location of Taylor Road and the Illawarra Highway is required to further limit the impact of the project in the 10 year and 20 year flood events. If impacts cannot be mitigated through adjustments to the design of the project, other mitigation measures offsite to the project must be implemented to manage the impacts.
- A report that details the impact on the project and areas downstream by implementing Flood Modification Option SI3 (Stormwater diversion at Croome Road & East West Link) as identified in the Horsley Creek Floodplain Risk Management Study and Plan (as adopted by Council), is to be provided to Council.
- A Dam Break Analysis, prepared by a suitably qualified dams safety engineer, is to be prepared when the detailed design for the augmented Green Meadows Detention Basin is complete. The Dam Break Analysis must document the final Flood Consequence Category for the dam, as approved by NSW Dams Safety Committee, and be submitted to Council for approval. The Dam Break Analysis must also investigate a design scenario that improves flood immunity to the proposed East-West Link Road, up to a 1%AEP, in order to provide for access in and out of Albion Park in the event of a 1%AEP flood.

Prior to completion of project:

- A final detailed design flood modelling report is to be provided to Council at the completion of the project. This report will document flood behaviour for the Works As Executed detail of the project.

Illawarra Regional Airport

OLS / PANS-OPS

Council considers that any penetration of the present code 2 OLS and future code 3 OLS is unacceptable, any consideration in variance to this would only be agreed if CASA and Airservices Australia approved such penetrations subject to approved shielding by terrain. In this regard there must be no impact on the current general RPT operations or future airport development. Planning for the Bypass and discussions held between RMS and Council in relation to the Illawarra Airport operations have been based on the present airport operational OLS being Code 2 with an aspirational Code 3 OLS being protected.

With the future implementation of RPT flight operations commencing 30 October 2017 using Code 3b / Code 3c aircraft the airport will now be progressing from Code 2 operations to Code 3 operations – this now means we will be using a Code 3 OLS which to date has been referred to the aspirational OLS. The implementation of Code 3 operations will now be progressed with CASA. If further details on the RPT service are required, Council will make them available.

It is understood that the bypass final construction heights have been based on Code 3 operations, however construction of the Bypass has been based on Code 2 operations – Council wishes to advise that this is not acceptable.

Council notes the following areas that will impact on the OLS as indicated below:

1. At Yallah Road: the realigned Yallah Road would be below the OLS except where it would tie in to the existing Yallah Road which already penetrates the code 3 take-off / climb surface for Runway 34.
2. At Croome Road where the new roundabout at the end of the East West Link would tie into the existing Croome Road, the existing Croome Road already penetrates the Code 3 take-off / climb surface for Runway 16.
3. On the southbound shoulder just south of Macquarie Rivulet for approximately 80m there would be a minimum 4.1m clearance on the eastern side of the shoulder to the take-off / climb surface for Runway 34 (RMS are requiring 4.6m clearance to allow for maximum oversize height vehicles). RMS proposes to treat this by applying 'no stopping' line-marking and signage in the area.
4. The proposed Haywards Bay noise wall will have a significant impact on the OLS for approximately 470m with the intrusion varying between 4.8 – 9.8m.

Consideration should be given to reducing these impacts where possible

Council requests that further risk assessment be completed on encroachments to the OLS.

Any redevelopment of the Croom Sporting complex must meet the requirements of National airports Safeguarding Framework (NASF) and MOS 139 - no penetration of the OLS is acceptable by any structure and all lighting must conform with NASF and MOS.

Council notes that within the Addendum Aviation Assessment, paragraph 3.2.1 states "a number of existing and proposed facilities within the Croom Regional Sporting Complex would also intrude on the aspirational OLS take-off climb surface" and that "the proposed facilities should not introduce a greater intrusion than present facilities" It also states "no lighting is proposed / assessed for the practice netball court's and AFL Oval". Council requires that any proposed intrusions into the OLS be clearly defined and assessed .

It should be noted that CASA has the following statement in the new proposed MOS 139 that is currently out for public comment and it is likely that the RMS reference in shielding may be different as CASA states in the proposed MOS 139 " a new obstacle is not to be considered as being shielded by an existing obstacle unless (a) CASA determines in writing that it is shielded" Therefore, the SSI Application should not be determined until this requirement is satisfied.

Construction

Council believes that the impacts on the airport operations impacting the OLS during construction must be resolved prior to approval. Council requires certainty of any impacts be resolved through the Department of Planning approval process.

In this regard, Council requires the following:

1. Construction works must not progress (crane operations) on both the Illawarra & Princess HWYs sites simultaneously as this will have substantial impacts on airport operations
2. Consideration that RWY threshold 34 is displaced by 176m – all construction planning must take this requirement into account. In this regard, to allow the reduction of operational length on RWY 16/34 to be reduced to 1,600m RWY 08/26 must be strengthened , have required lighting and PAPI installed and extended to 1600m at no cost to Council.
3. RMS should undertake a full assessment of the impacts of the above extension which should include as a minimum;

- Suitability for Code 3 aircraft operations
 - Design / modelling of approach and departure paths to identify limitations on aircraft operations
 - Suitability of instrument non-precision operations
4. To allow Wings Over Illawarra Air show to proceed unimpeded in the first weekend of May (Thursday to Sunday) construction cranes shall be removed to allow full length of RWY 16/34 to be operational.
 5. With increased hours of construction 0600-1900hrs any lighting used on work sites must comply with National Airports Safeguarding framework guidelines and MOS139

Wildlife Risk

Council requires that all parts of the project give consideration to the vegetation used to ensure no increase in wildlife affecting airport operations, additionally such vegetation planted should ensure that such future vegetation growth does not impact on the OLS requirements.

Croom Sporting Complex

Council would like to reiterate its previous comments and require these to form part of any approval given that the proposed works form part of the application. With regard to the Croom Regional Sporting Complex, Council has worked cooperatively with RMS on a master plan for the complex. This has also involved sporting groups located at Croom. The master plan has been publically exhibited and has been endorsed by the Council. Council notes that the following requests have been agreed to by RMS:

- All directly impacted sporting facilities are replaced with similar facilities
- Council as owner of the facility will work directly with RMS in the more detailed design phase on the amenities, car parking and other infrastructure to be replaced or in addition to what is currently there (e.g. lighting and irrigation)
- There is a vehicle and pedestrian access throughout the Croom Regional Sporting Complex
- The addition of a single lane vehicle access into the complex from the western Terry Reserve sporting area into the Croom Regional Sporting Complex.
- Access to the Croom Stadium is available at all times

New sporting facilities for AFL/Cricket to be constructed and horse arenas, junior rugby league fields to be reconfigured, public horse arenas relocated and new grass netball courts to be constructed as per the concept plan that was provided by RMS and endorsed by Council. Council requires that "Like for Like" replacements be at current standards.

Biodiversity

Area of impact

There is some inconsistency regarding the actual area of impact of the project on biodiversity. The SPIR states 'the area directly impacted by the project has not changed from the environmental impact statement' however table 5-12 in the SPIR (Volume 1, page 258)

states an overall increase in the impact area, including an additional 0.22ha of Illawarra Lowlands Grassy Woodland EEC. No mapping or explanation is provided to illustrate the location of the increased and decreased impacts.

Additionally, the EIS states that 0.22ha of vegetation in Croom VCA will be impacted, whilst the SPIR states 0.15ha will be impacted in the VCA.

Clarification is sought regarding the exact area of biodiversity impact, and the specific location of additional increases or decreases in impacts.

EPBC Act Referral

The SPIR indicates that the project has been referred to the Commonwealth Department of Environment and Energy (DEE) in relation to impacts on the EPBC Act listed Illawarra & South Coast Lowland Forest and Woodland (ISCLFW) Critically Endangered Ecological Community (CCEC). It is unclear if the revised project footprint and increased biodiversity impact has also been referred to the Commonwealth.

The SPIR also states that a pre-lodgement meeting has been held with DEE and that it was indicated that the 'Department of Environment and Energy would endorse the use of the NSW FBA for calculation of offset requirements. No separate calculation of EPBC Act offsets has therefore been undertaken. The final offset package will ensure 'like for like' offset of impacts for the EPBC Act listed CEEC'. As the Biodiversity Offset Strategy (BOS) is yet to be finalised, the adequacy of the proposed offsets to meet the 'like for like' requirements of the Commonwealth cannot be ensured. Finalisation of the BOS is required and endorsement of the offset sites as being 'like for like' or details of additional offsets required by the DEE is required.

It is recommended that project approval be conditional upon finalisation of EPBC Act Offset requirements within the Biodiversity Offset Strategy.

Croom Voluntary Conservation Agreement (VCA)

Croom Reserve is currently protected under a VCA, therefore works in the reserve cannot commence until the agreement is extinguished and a Biobanking Agreement is finalised. Discussions are continuing between Council and the Biodiversity Conservation Trust in this regard.

It is recommended that project approval be conditional upon the seamless extinguishment of Croom VCA and finalisation of a Biobanking Agreement for Croom Reserve.

Conditions should also include that no impact can be made on Croom Reserve VCA area until a Biobanking agreement is finalised.

Biodiversity Offset Strategy

RMS have indicated in the SPIR their preference for offset sites to be on Council land. Council are interested in pursuing offset sites on Council land, including Croom Reserve as noted above. Discussions are continuing to secure sites, however the finalisation of a Biobanking agreement is likely to take some time and may not align with the project timeline and milestones. Therefore, the project should be conditioned that the Biodiversity Offset Strategy must be finalised within 12 months of project approval and all required credits retired within 2 years of project approval.

Variation of construction hours (noise impacts)

The SPIR includes a variation of construction hours as follows:

| Construction Hours | Monday to Friday | Saturday | Sunday/ Public holiday |
|---------------------------|--|--------------------|-------------------------------|
| Standard Hours | 7:00 am to 6:00 pm | 8:00 am to 1:00 pm | No work |
| Extended Hours | 6:00 am to 7:00 am 6:00 pm to 7:00 pm | 1:00 pm to 5:00 pm | No work |

The justification provided by RMS as to the increase in construction hours is to reduce the length of the project. No indication is given as to actual reduction in project length due to increased construction hours. Details of the content of community consultation regarding the variation of construction hours and responses received is not included in the SPIR. Therefore, support or opposition to the increased construction hours cannot be validated. It is also concerning that of the ~1000 residences surveyed, with less than half (444) of the surveys were returned.

Additionally, The SPIR states: *‘Seven residences were targeted for individual briefings due to potential exceedances of 30dB or more above rating background level. Four of these were successfully briefed and supported the extended work hours. The remaining three were not available for individual briefing’*. As Db is logarithmic, a 30db increase could be insignificant or could be drastic. 85db average noise levels are only allowed by work practices for 8 hours, extended construction hours at this Db could contravene the WHS act (<http://www.safework.nsw.gov.au/health-and-safety/safety-topics-a-z/noise-at-work>).

Wayfinding

Council requests an allowance for directional signage for our major community assets including the airport, business areas and tourist areas. Council would like to see the inclusion of these wayfinding signs as a condition of consent.

Public Art / Aesthetic Treatment and Landscaping

Council request collaboration regarding the aesthetic treatment of walls, screens, fencing, cuttings, bridges and landscaping. Final designs should be submitted to Council for endorsement.

Heritage

There is inadequate information and assessment of the impact to the heritage significance of the Council owned Heritage Item Swansea Farm House. The previous version of the EIS excluded the farmhouse and an extensive area surrounding the farmhouse from the area covered by the EIS and therefore it was considered that there was minimal impact. However, the revised EIS area now surrounds the item but for some reason strangely cuts out around the actual structures. It is unclear as to why this would occur and why the item in its entirety is not included in the EIS area. The documents provided are inconsistent and fail to flag the proposed construction road through the heritage item (between the homestead and out buildings) in the response to issue 26 and Table 5.2 Design Refinements. The revised Heritage Assessment is inadequate and considers that the temporary nature of the road somehow reduces the possible impact.

An assessment of the possible impacts of the proposed construction road within such close proximity to the heritage house and outbuildings has not been done and therefore any impacts have not been adequately addressed, nor has the possible impact on any archaeological deposits that may lie under the alignment of the proposed road. The limitations on any use of this building during the construction phase has also not been addressed. The home may be currently vacant but this should not be assumed for the duration of the construction.

The SPIR specifies that the impact on the heritage site has increased from “minor” to “moderate”. This is of great concern to Council and more information is needed to clarify details such as how many trucks will be using the road, how heavy are the vehicles using the road and for what length of time are the vehicles using the road. This is required to ensure appropriate management options are available and could be actioned before, during and after the project to mitigate adverse impacts on Swansea Farm House structures.

The RMS has recently presented Council with an alternative construction access road which is located some distance north of the Swansea Farm House (**Attachment 3**).

Without the detailed information specified above it is considered that this alternative route (**Attachment 3**) which is located to the north and further from the structures of the Swansea Farm House, is Councils preferred option for the Construction Access Road. This would also be consistent with the Burra Charter (the accepted best practice principles for heritage conservation). Council would like to stress that this advice is given in the absence of more detailed information of construction impacts and a more extensive heritage assessment having been made available to council on both options.

Council has recently received correspondence from the RMS dated 22 September stating that the RMS is now planning on using the northern access, however, if the Department were of a mind to approve the construction access road in the proposed location between the Swansea Farm House and nearby outbuildings, Council believes that a structural assessment and dilapidation report must be undertaken and any impacts resulting from the proposed works and operations must be mitigated and/or rectified as part of the project and at no cost to Council. This is also required to ensure appropriate management options are available and could be actioned before, during and after the project to mitigate adverse impacts on Swansea Farm House structures.

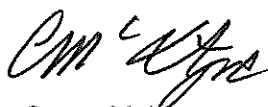
In order to mitigate adverse environmental issues, including but not limited to visual and dust impacts, vegetative screening and sealing of this road would be required as a minimum.

Conclusion

Shellharbour City Council continues to offer qualified support for the SSI Application but does not believe it should be approved in it's current form. Council would appreciate the opportunity to further work with the RMS and the Department to arrive at an appropriate outcome for the City and the Illawarra Region.

Should you require further information or clarification of these issues please contact Councils Group Manager City Planning, Geoff Hoynes on (02) 4221 6233.

Yours sincerely



Carey McIntyre
General Manager

Attachment 1 – Summary of SCC Comments on SPIR

| | Original SCC Comment | RMS Response | New SCC Comment |
|---|---|--|---|
| 1 | 2000, 2004 LEP not referenced | RMS notes, SSI Part 5.1 | Relationship to In2 lands not considered. |
| 2 | Groome Regional Sporting Complex "Like for Like" Consultation with SCC Single lane crossing to Terry Reserve Maintain access to stadium | RMS acknowledges and has incorporated or actioned | Refer to detailed submission for comments |
| 3 | Stormwater reuse | RMS is investigating options with SCC | Noted - no further comment. |
| 4 | Support contingent on south facing ramps | RMS acknowledges and now includes south facing ramps without the dependence of Tripoli Way. RMS will continue to consult with Council regarding the timing and connection of the motorway to the bypass of Albion Park (Tripoli Way) | Refer to detailed submission for comments |
| 5 | Is infill development included in traffic model | yes, wider growth was factored in | Noted - no further comment. |
| 6 | Impacts to OLS need to be considered in Detailed Design need to detail impacts so that Council can engage with CASA and ASA – states affects on aspirational operations | RMS acknowledges and has engaged with Council regarding impacts | Refer to detailed submission for comments |

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|----|---|--|---|
| 7 | Mitigation measures need addressing and work has commenced and these should be considered as hold points in the process | RMS commit to manage the impacts on the operation of the airport and continue to work with SCC | Refer to detailed submission for comments |
| 8 | Vegetation and ponds should not attract wildlife | Impacts assessed in aviation technical paper - no impacts identified Motorway and toads not land uses which identify as presenting risk of wildlife strikes to aircraft | Refer to detailed submission for comments |
| 9 | No assessment on impacts of changes to Croom Complex re lighting, height and wildlife impacts | Impacts comprehensively assessed including impacts to airport | Refer to detailed submission for comments |
| 10 | 20 year ARI flood standard too low | RMS has achieved 100 year ARI with the exception of Duck Creek Bridge | Refer to detailed submission for comments |
| 11 | Impacts on agricultural land up to 400mm would have significant impacts and should be reviewed | Majority below 250mm, this floodplain is routinely flooded to substantial depths, very little change in duration 100 y 9h 5 minutes extra | Noted - no further Comment |

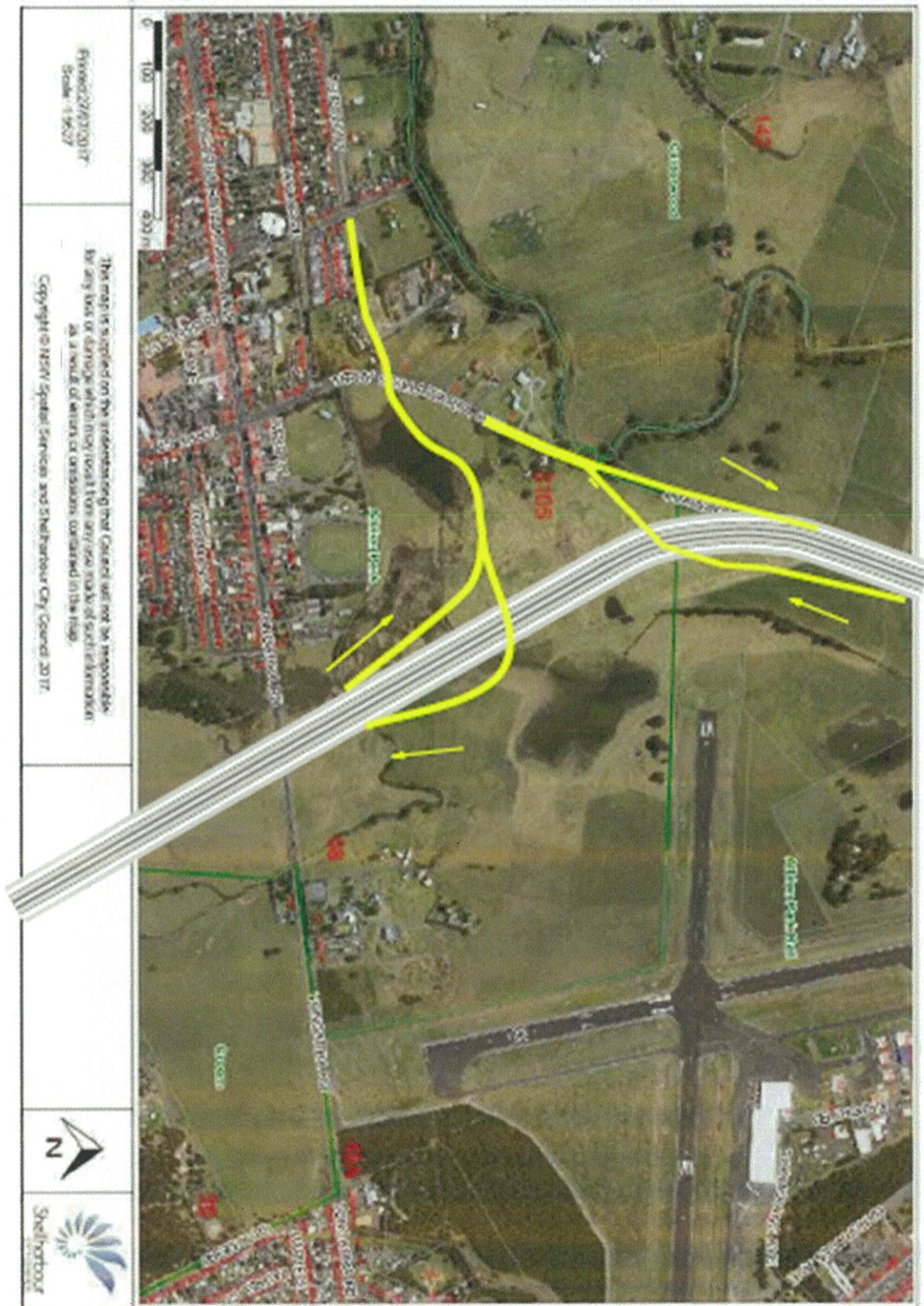
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| 12 | Access in and out of Albion park would not achieve a 100 year immunity if the new east west road is increased this could be achieved | Albion Park is impacted by flooding, Tongarra Road improved, northern ramps achieve 100 year ARI, east west link is spillway for Green Meadows basin same immunity as in now | Refer to detailed submission for comments |
| 13 | Dam Break assessment for Green Meadows Basin required consult with SCC long term maintenance issue | RMS will undertake a Dam Break Assessment during detailed design and consult with SCC raising east west link would increase consequence category | Noted - no further comment |
| 14 | Reserve downstream of Greenmeadows Basin – 10 proposed discharge points into reserve | RMS will undertake consultation with SCC regarding proposed discharge points during detailed design | Noted – Major Issue to be resolved to Council's satisfaction |
| 15 | Is a basin upstream of Oak Flats interchange included | Outside project scope, design does not preclude SCC or RailCorp undertaking work | Noted - no further comment |
| 16 | Detention Basin near Groom Road maintenance, details of 23 properties not flooded, discharge to Macquarie Rivulet | RMS will consult with SCC about asset ownership, 23 properties will be provided, have not discharged to Macquarie Rivulet review in Detailed Design | Noted- no further comment |
| 17 | RMS to maintain water quality controls | RMS to consult with SCC | Refer to detailed submission for comments |
| 18 | Green Meadows basin drainage structures maintenance | RMS to consult with SCC | Refer to detailed submission for comments |

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| 19 | Taylor Road flooding what option has RMS looked at to reduce flooding | Ran some initial models, impacted by 2 year event, very sensitive to changes in this area, outside project footprint, still flooded in 2 year event, Tripoli Way would connect after Taylor Rd refine during detailed design | Refer to detailed submission for comments |
| 20 | 2013 IFD data not accurate | Not using this data, using older data | Noted – no further comment |
| 21 | Flood Impacts to two properties any other garages etc, mitigation important | No additional impacts identified to other structures, mitigation will be investigated during detailed design, flood impacts reduced using new model. | Noted - no further comment |
| 22 | Geomorphological assessment of impact to streams required | Impact to streams and scour addressed in detailed design velocity objectives met | Noted - no further comment |
| 23 | Wallabies and fauna movement | Large bridge structure provided with riparian veg, highly mobile adaptable species, assessment in accordance with FBA | Noted - no further comment |
| 24 | Indirect effects not considered on Croom | Indirect impacts identified and assessed mitigation provided | Refer to detailed submission for comments |
| 25 | Original Marks Villa and relocated Marks Villa still heritage although removed from schedule | No direct impact on Marks Villa Project boundary avoids, major changes to Marks Villa no significant impact | Noted. No further comment |

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| 26 | No impact to curtilage of Swansea Farm House by road | Changes to Croom layout will have moderate impact on the curtilage | Refer to detailed submission for comments |
| 27 | Impact to Boles regrettable archival recording appropriate | RMS acknowledges this and planning on saving homestead | Not clear from information provided. SCC believes this appears to be proposed to demolish. SCC request this heritage item to NOT be demolished. |
| 28 | Mitigation for Tongarra Road homestead and Stapletons bridge supported check Missinghams Tannery site | Noted, unlikely to have Missinghams Tannery however if found during excavation unexpected finds procedure to be followed | Noted - no further comment |
| 29 | Mitigation supported for Ravenssthorp | Ack RMS has implemented measures | Noted - no further comment |
| 30 | Clarification regarding bridge (pg 81) is scheduled for removal | RMS acknowledge minor inaccuracy – the bridge across Macquarie rivulet is not proposed for removal | Noted – no further comment |
| 31 | List of typographical errors | RMS acknowledge the minor typographical errors within non-Aboriginal Heritage, however, the conclusions regarding the nature of impacts on non-Aboriginal heritage are still valid | Noted – no further comment |
| 32 | Social Impact to retail and trade and social co-hession | Undertook business impact assessments and socio economic impacts concluded that highway dependent trade may decline but non highway trade likely to improve, positive impact to social cohesion | Refer to detailed submission for comments |

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| 33 | Public Art could be included | RMS are not going to incorporate public art but this could be incorporated on Council owned land in CRSC | Council request collaboration on aesthetic treatment of walls, screens, fencing, cuttings and bridges. The final designs should be submitted to Council for endorsement. |
| 34 | Consultation could be undertaken Shellharbour City Business Network and Shellharbour Crime Prevention Partnership | RMS undertaken expensive consultation more opportunities will be provided during the project | Noted - no further comment |
| 35 | RMS efforts to minimise visual impacts acknowledged | Noted | Noted -no further comment |
| 36 | Need to consider areas that could be used for anti-social behaviour or dumping etc | Ack by RMS, SCC comments on CRSC | Noted - no further comment |
| 37 | Land use assumptions should be reviewed by DoPE | Land use assumptions reviewed by DoPE and updated to latest data | Noted - no further comment |
| 38 | Land use impacts should be minimised | Land use impacts assessed and RMS to consult with impacted land owners | Noted - no further comment |
| 39 | Illawarra Business Park lapsed? | RMS refers to approval date being passed – considered lapsed | Noted - no further comment |

Attachment 2 – SCC Revised Alternative Option for Central Interchange



Attachment 3 – Council Preferred Alternative Construction Access Road

