

1 Susan Street, P.O. Box 118, NSW Australia 1835

Glenn Snow Team Leader - Roads Infrastructure Projects Department of Planning & Environment GPO Box 39 SYDNEY NSW 2001 Telephone 9735 1222 Facsimile: 9643 1120 ABN 63 914 691 587

Contact Name: Monica Cologna TRIM No: T085748/2014 Date: 19 August 2014

Dear Glenn,

Attention: Alexander Scott

SUBJECT: Westconnex M4 Widening (SSI-6148) – Submission to exhibition of Environmental Impact Statement

Thank you for the opportunity to comment on the Westconnex M4 Widening Environmental Impact Statement. Attached is Auburn Council's final submission on the proposal. The final submission addresses the key impacts of the proposed M4 Widening on the Auburn LGA, many of which have been previously raised with the Department.

The draft submission that was previously sent to the Department by email on 12 September 2014, has been updated as a result of Council's resolution of 17 September 2014 (resolution 268/14), which states:

1. That Council endorse the draft submission as attached, subject to the inclusion of a right-hand turning lane where the eastbound off ramp meets Hill Road at Lidcombe and that the Hill Road off ramp be increased to two lanes.

Should you have any queries in relation to the Planning Proposal, please contact Monica Cologna, Manager Strategy on 9735 1355.

Yours faithfully

una Cologna

MONICA COLOGNA MANAGER STRATEGY

This letter contains important information. If you do not understand it, please come to Council's Administration Building and discuss the letter with Council staff who will arrange Interpreter services, or contact the Telephone Interpreter Service 131 450 and ask them to ring Council on 9735 1222

Bu mektup önemli bilgileri içermektedir. Mektubu anlayamıyorsanız lütfen Belediye'nin Yönetim Binası'na gelin ve mektubu, tercümanlık hizmetini ayarlayacak olan Belediye görevlileri ile görüşün ya da 131 450 numaralı telefondan Telefonla Tercüme Servisi'ni arayarak 9735 1222'den Belediye'ye telefon etmelerini isteyin.

Lá thư này có các thông tin quan trọng. Nếu quý vị không hiểu, xin ghé tới Tòa Nhà Hành Chánh (Administration Building) của Hội Đồng để thảo luận với nhân viên của Hội Đồng về lá thư này. Họ sẽ sắp xếp dịch vụ thông ngôn. Hoặc quý vị có thể liên lạc với Dịch Vụ Thông Ngôn Qua Điện Thoại ở số 131 450 và nhờ họ gọi cho Hội Đồng ở số 9735 1222

這封信包含重要的資料。如果你不明白信的內容,請到市議會的行政大樓詢問市議會職員,他們會安排傳譯服務;你亦可致電 131 450 聯絡電話傳譯服務,要求他們撥電市議 會,電話 9735 1222。

يحتوي هذا الخطاب على معلومات هامة. إذا كنت لا تفهمها، برجاء الحضور إلى مبنى إدارة البلدية لمناقشة الخطاب مع موظفي البلدية وسيقوموا بإعداد خدمات الترجمة الشفهية، أو اتصل بخدمة الترجمة الشفهية على الرقم 450 131 واطلب منهم الاتصال بالبلدية على الرقم 1222 9735.

WESTCONNEX M4 WIDENING ENVIRONMENTAL IMPACT STATEMENT AUBURN CITY COUNCIL SUBMISSION

WestConnex is a NSW Government key infrastructure project which aims to ease congestion, create jobs and connect communities. It is the largest integrated transport and urban revitalisation project in Australia. The 33 kilometre project was a key recommendation of the State Infrastructure Strategy released in October 2012. It brings together a number of important road projects which together form a vital link in Sydney's Orbital Network. They include a widening of the M4 east of Parramatta, a duplication of the M5 East and new sections of motorway to provide a connection between the two key corridors.

The Environmental Impact Statement (EIS) for the M4 Widening from Pitt Street, Parramatta and Homebush Bay Drive, Homebush was placed on public exhibition from by the NSW Department of Planning and Environment (DP&E) from Wednesday 13 August 1994 until Friday 12 September on the DP&E website and at selected locations including Auburn Council Customer Service Centre and at Auburn, Lidcombe and Newington Libraries. Council has also made the EIS available for viewing on Council's website.

FINAL SUBMISSION

This document is the final submission from Auburn City Council to the M4 Widening EIS. The submission addresses the key impacts of the proposed M4 Widening on the Auburn LGA, many of which were previously provided as comments to the DP&E. Generally, these issues have not been meaningfully addressed in the EIS. The main issues include:

- 1. Council requested the additional of westbound exit near/onto Hill Road. No consideration has been made to the inclusion of a west bound exit near/onto Hill Road from the M4, however the EIS states that the matter will be investigated as part of the detailed design.
- Council requested details of the impacts and management of traffic on the local road network. The EIS identifies significant impacts on the local road network particularly along Parramatta Road, and the Hill Road corridor, and that some infrastructure upgrades will be required. However it does not identify funding sources or timeframes for these upgrades.
- 3. Council requested investigation of improved access and upgrades of local cycleways. No additional cycleways/cycling facilities are proposed by the EIS.
- 4. Council requested the preparation of a Site Audit Statement to address development of potentially contaminated land.
- 5. Council requested measures to reduce and protect stormwater systems (including Duck River) from pollution via run off. The EIS makes limited references to the provision of these measures or for ongoing monitoring of pollution. It is noted that this is already an issue with the existing M4 motorway. The EIS makes no provision to address this existing issue.
- 6. Council requested the consideration of sensitive seawall design and the protection of vegetation related to new development within riparian zones, such as the Duck River and Haslams Creek.

7. Council requested the impacts of additional motor vehicle emissions on local air quality. The EIS states that any increase in emissions will be small and no specific measures are considered necessary to address these. However, the EIS indicates an increase in emissions along Parramatta Road, without identifying any methods to mitigate the impacts of these emissions.

Council also wishes to include an additional request that the applicant / WestConnex incorporate an amendment into the final detailed design of the M4 widening project. The requested amendment is the inclusion of a right-hand turning lane where the eastbound off ramp meets Hill Road at Lidcombe, and that the Hill Road off ramp be increased to two lanes.

These issues are addressed in more detail in the table attached below, which forms part of this submission.

WESTCONNEX M4 WIDENING – ENVIRONMENTAL IMPACT STATEMENT AUBURN CITY COUNCIL SUBMISSION TABLE

GENERAL REQUIREMENTS / COMMENTS

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Land acquisition The application should clearly indicate where land acquisitions will be required (both private land and government/Council owned land).	Council needs to be made aware of any land acquisitions that may be required under the WestConnex proposal. In particular, Council needs to know more detail about possible plans to acquire Council land on Hill Road, and arrangements for the existing advertising signage which is subject to a current lease agreement over Council's land.	Section 5.3.12 – Property access and acquisition Tables 5.5 and 5.6 Not addressed in Section 7.4.2 – Issues raised by government agencies and councils and Table 7.1	 Section 5.3.12 – Property access and acquisition discusses land acquisitions and a site list is provided in Table 5.5 and 5.6. The tables list includes partial acquisition and temporary lease of the Hill Road Reserve, corner of Hill Road and Carter Street (Lot 48 DP 225351). The EIS states that "final acquisition requirements would be confirmed through detailed design in consultation with landowners. All property valuations and acquisitions would be carried out in accordance with the Land Acquisition Information Guide (Roads and Maritime, 2012) and the (NSW) Land Acquisition (Just Terms Compensation) Act 1991." 	Noted. Council is pursuing this matter with the Roads and Maritime Services.

TRAFFIC AND TRANSPORT

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Westbound Hill Road exit Consideration should be given to the inclusion of a westbound exit near Hill Road.	The current proposal includes a new eastbound onramp at Hill Rd, but not an equivalent westbound exit. Vehicles travelling to areas north of Hill Rd (e.g. Wentworth Point, Sydney Olympic Park) heading westbound would need to use either the Silverwater Rd or Centennary Drive exists. A new westbound exit would reduce travel times and uncomplicate the route to these areas. It should be noted that significant residential and employment growth is also proposed in areas north of the M4 such as Wentworth Point and Carter Street Urban Activation Precincts, and Sydney	Section 4.4.4 – Hill Road Section 7.4.2 – Issues raised by government agencies and councils Table 7.1	 The current proposal does not provide an off ramp, however the EIS states that the matter will be investigated as part of the detailed design. Extract from Section 4.4.4 "Westbound off-ramp to Hill Road A number of options to provide westbound access from the M4 Motorway to Hill Road were considered. These included: A direct connection from the M4 Motorway to Hill Road via an overpass ramp. Access to Hill Road via Parramatta Road with a new connection from the M4 Motorway to Parramatta Road to the east of the existing Hill Road via Parramatta Road with a new Connection from the M4 Motorway to Parramatta Road to the east of the existing Hill Road via Parramatta Road with a new M4 Motorway westbound off ramp connecting to Parramatta Road at Nyrang Street (near Haslams Creek). A range of issues, including cost and property impacts, were identified during preparation of the WDA concept design. A westbound off-ramp to Hill Road is not considered further in 	Council reaffirms its commitment to the provision of a westbound exit near Hill Road and requests the applicant / WestConnex to include this in the detailed design.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
	Olympic Park.		this EIS. Cost effective options are being investigated as part of the detailed design."	
Eastbound Hill Road exit New request.	New request.	N/A	N/A	Council requests that the applicant / WestConnex incorporate an amendment into the final detailed design of the M4 widening project. The requested amendment is the inclusion of a right- hand turning lane where the eastbound off ramp meets Hill Road at Lidcombe, and that the Hill Road off ramp be increased
Additional traffic resulting from M4 widening The impact of the proposal on specific intersections should be identified and managed.	These intersections were identified for improvements by previous traffic & transport studies undertaken by Council. Residents of Lidcombe	Section 8.1 and Appendix D – Chapter 7, page 164 Section 7.4.2 – Issues raised	The EIS identifies the network operational improvements on the M4. There are heavy impacts on the local road network particularly the Hill Road corridor and states that infrastructure upgrades would be required along the Hill Road corridor. (Volume 2 – Appendix D – Chapter 7 page 164).	to two lanes. Council is greatly concerned about the delays of up to 11 <i>minutes</i> at the Hill Road / Carter Street intersection, as indicated in the EIS.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
In particular: Parramatta Road / Hill Road Hill Road / Carter Street Carter Street / Uhrig Road Birnie Avenue / Carter Street Hill Road / M4 Ramps	are expected to use Birnie Avenue-Carter Street to join southbound traffic on Hill Road to use new eastbound ramp towards Sydney.	by government agencies and councils Table 7.1	Extract from Appendix D - Chapter 7 page 164 (key points have been bolded by Council) "In the morning peak of the Full WestConnex scenario (refer Table 7-21) further increases in traffic yield poor performance on the Hill Road corridor. The intersection of Hill Road/Parramatta Road is now expected to operate at LoS F. The M4 Motorway off-ramp is also expected to operate at LoS F, whilst the Hill Road/Carter Street intersection operates with an average delay of over 700 seconds and a LoS F. In the evening peak of the Full WestConnex scenario (refer Table 7-22) further increases in traffic yield poor performance at the intersection of Hill Road/Parramatta Road, which is again expected to operate at LoS F Considering the above, it is expected that some infrastructure upgrades would be required along the Hill Road corridor in order to bring the corridor to capacity in the future year scenarios . This may involve signalising the priority intersections at the M4 Motorway offramp and Hill Road/Carter Street,	Council urgently requests that the applicant / WestConnex address infrastructure upgrades to the roads and intersections impacted by the WestConnex, particularly along the Hill Road corridor, and that these be included in the detailed design stage of the project, and that funding sources for these upgrades be provided by the applicant.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
			as well as further capacity improvements."	
Urban Activation Precincts and new development The application should consider planning processes underway at Wentworth Point, Carter Street, and Sydney Olympic Park.	 Planning processes are currently underway in Wentworth Point, Carter Street, and Sydney Olympic Park that are likely to result in significant dwelling and employment growth. It is important that the traffic impact of these proposals be considered as part of the EIS. These processes are: Wentworth Point Urban Activation Precinct (~2,300 dwellings) Amendment to Homebush Bay West DCP (1,300 dwellings) Remaining development potential under the 	Section 8.1 and Appendix D – Chapter 7 pages 105 Section 7.4.2 – Issues raised by government agencies and councils Table 7.1	Traffic modelling for the project did not include the forecasts for additional dwellings and employment provisions in the Carter Street and Wentworth Point Urban Activation Precincts (Volume 2 – Appendix D – Chapter 7 pages 105 and 164). Extract from Appendix D - Chapter 7 page 105 <i>"It should be noted the BTS projections will be updated in future to reflect planning work being undertaken for the Carter Street and Wentworth Point Urban Activation Precincts and more broadly, concepts being developed through WestConnex revitalisation work on a land use and transport structure plan. This information was also not yet available for this assessment."</i>	Council requests that the applicant / WestConnex revise traffic forecasts and modelling to include the likely significant dwelling and employment growth forecasts for the Carter Street and Wentworth Point Urban Activation Precincts and Sydney Olympic Park, so that a true indication of the traffic impact of WestConnex on the local road network can be assessed and planned for.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
	 Sydney Olympic Park Masterplan, and Carter Street Urban Activation Precinct (~5,600 dwellings, ~5,500 jobs). 			
Additional traffic on Parramatta Road The application should model the likely short, medium and long term impacts on Parramatta Road, including during the construction phase.	Once the application is exhibited, Council will need to be provided with information about the proposal's impact on Parramatta Road in order to provide meaningful comments.	Section 8.1.5 – Assessment of potential operational traffic and transport impacts Tables 8.5 and 8.6 <i>Not addressed in Section</i> 7.4.2 – Issues raised by government agencies and councils and Table 7.1	Section 8.1.5 of the EIS shows that WestConnex will result in a significant increase in traffic on alternative west-east routes including Parramatta Road, Victoria Road and the M2 Motorway, primarily due to toll avoidance. The modelled increase in traffic on Parramatta Road, shown in Tables 8.5 and 8.6, from the 2021 Base "do minimum" case to the M4 Widening case is 35% (from 43,990 to 59,370). While the increase in traffic on Parramatta Road from the 2031 Base "do minimum" case to the Full WestConnex is 20% (from 52,030 to 62,490). Further, the modelling figures provided do not show where all the M4 traffic will be redirected to, resulting in considerable uncertainty about	Council requests a commitment to upgrade key intersections along Parramatta Road and the Auburn LGA local road network that will be detrimentally affected by M4 widening / WestConnex. These include, but are not limited to Parramatta Rd/Rawson Rd Auburn, and Parramatta Rd/Hill Rd, Homebush Bay.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
			the impacts of the proposal on traffic on other Sydney roads, as follows:	
			• The modelling shows a decrease in M4 traffic in 2021 of 64,728, but only 31,084 vehicles movements are accounted for in the main east-west routes, a shortfall of 33,664.	
			• The modelling also shows a decrease in M4 traffic in 2031 of 25,420, but only 18,390 vehicles movements are accounted for in the main east-west routes, a shortfall of 7,030.	
			It can reasonably be assumed that the majority of this unaccounted traffic will redirect onto the local road network near the M4, such as those within the Auburn LGA.	
			The redirection of increased traffic to Parramatta Rd will reduce its amenity, which is inconsistent with the stated intent of the WestConnex to support the revitalisation of Parramatta Rd. It will also disadvantage bus commuters, as buses will also be delayed by the additional congestion on Parramatta Rd.	

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Auburn Traffic and Transport Study The application should consider relevant traffic studies that have been undertaken by Councils and the State Government.	Auburn Council has recently undertaken the draft Auburn Traffic and Transport Study, and the Department of Planning and Infrastructure has undertaken traffic studies for the both the Carter Street and Wentworth Point Urban Activation Precincts. These are relevant to the application and should be reviewed by the applicant. A copy of the draft Auburn Traffic and Transport Study can be provided upon request.	Not addressed in Section 7.4.2 – Issues raised by government agencies and councils and Table 7.1	The draft Auburn Traffic and Transport Study, and the Department of Planning and Infrastructure traffic studies for the Carter Street and Wentworth Point Urban Activation Precincts were not addressed in the EIS.	Council again request that the applicant / WestConnex review the draft Auburn Traffic and Transport Study, and the Department of Planning and Infrastructure traffic studies for the Carter Street and Wentworth Point Urban Activation Precincts prior to the final design stage.

VISUAL AMENITY, BUILT FORM AND URBAN DESIGN

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Cycleways The application should maximise opportunities to improve existing cycleways and access to them.	 In particular, this project presents a great opportunity to improve missing links in the cycleway, by providing: improved lighting and signage a Bridge over Haslams Creek, and a cycleway between Haslams Creek and Concord Road (the current cycleway runs between Parramatta and Sydney Olympic Park only). It is noted that major road projects such as the M7, M2 and City West Link include dedicated or shared cycleways that follow the road in parallel for 	Section 5.3.6 Pedestrians and cyclist facilities Section 8.1.5 – Assessment of potential operational traffic and transport impacts Section 7.4.2 – Issues raised by government agencies and councils Table 7.1	The EIS addresses this issue as outline below. No additional facilities have been included or considered in the proposal or the EIS. Extract from Section 5.3.6 "5.3.6 Pedestrians and cyclist facilities Cyclists currently use the 2.5 metre outside shoulders of the motorway to travel both eastbound and westbound, except between Church Street, Parramatta and Silverwater Road, Auburn where cyclists are prohibited from the motorway and a dedicated off-road cycleway is provided. The project would retain these arrangements and no additional facilities are proposed. Pedestrian crossings of the motorway are available via cross street overbridges, underbridges and the Melton Street pedestrian bridge to the west of the Silverwater Road interchange. There is currently no pedestrian access along the motorway and none is proposed as part of the project."	Council request that the applicant / WestConnex reconsider the design and financing of improved cycleway facilities as part of the M4 widening / WestConnex project.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
	most of the motorway. Consultation with the Lidcombe Auburn Cycle Club (LACC) is encouraged.			
Cycleway management The application should identify any proposed disturbances to the existing cycleway, and how these will be managed.	It is very likely that the proposal will have an impact on the cycleway underneath the M4 for an extended period.	Section 8.1.4 – Assessment of potential construction traffic and transport impacts Table 8.4.	Addressed as below in sections 8.1.4 - Impacts on pedestrians and cyclists, Table 8.4 and 8.1.5 - Assessment of potential operational traffic and transport impacts. The management plan appears to be appropriate. Council should request that the applicant provide sufficient and timely prior notice of all cycleway disturbances as they are required.	Council request that the applicant / WestConnex provide sufficient and timely prior notice of all cycleway disturbances as they are required.
		Section 8.1.5 – Assessment of potential operational traffic and transport impacts Section 7.4.2 – Issues raised by government	Extract from Section 8.1.4 "Where there is possible interaction between construction traffic and pedestrians and cyclists (eg at work site/compound access points) traffic controllers or diversions would be used to ensure adequate protection is provided and/or risks minimised. If a temporary diversion is required for cyclists using the M4 Motorway shoulder, the alternative routes would be outlined in the Construction Traffic Management Plan and communicated to the public, including users of the pedestrian and	

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
-		agencies and councils Table 7.1	 cyclist facilities, via the methods outlined in section 7.5.4." Table 8.4 identifies the Duck River shared path as being impacted, stating "The shared path may be crossed occasionally by construction vehicles which would be facilitated by a traffic controller." Extract from Section 8.1.5 "Impact on pedestrians and cyclists The redistribution of west–east traffic away from the M4 Motorway would increase traffic on alternative parallel routes, particularly Parramatta Road which is used by pedestrians and cyclists. The signalised intersections along Parramatta Road have controlled pedestrian crossings and these facilities would not be impacted by the project. Therefore, pedestrian ability to cross Parramatta Road would not be impacted by the increase in traffic volumes on 	
			the road. The M4 Widening project does not impact on local or arterial roads and their associated footpaths. The off-road pedestrian and shared paths	

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
			described in section 8.1.2 would be maintained and cyclists would continue to be able to use the shoulders of the M4 Motorway west of Church Street as is the case at present. Motorway ramp bicycle crossings would be provided in accordance with standard motorway design practice. Therefore, no operational impacts on cyclists and pedestrians are expected as a result of the M4 Widening project."	

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Contamination The application should be required to include contamination assessment in accordance with the requirements of SEPP55 and the Contaminated Lands Management Act. In this regards it is recommended that the application include a Section B Site Audit Statement.	In accordance with Clause 7 of SEPP55 the consent authority must not consent to carrying out of development unless it has considered if the land is contaminated. Given the size, scope various historical land uses and public interest associated with the project, it is recommended that contamination assessment include a Section B Site Audit Statement prepared by a suitably qualified site Auditor.	Appendix G – Soils, Water and Waste Technical Study Not addressed in Section 7.4.2 – Issues raised by government agencies and councils and Table 7.1	In the documents included with the EIS no reference is made to SEPP 55 and the requirement in section B for a Site Audit Statement. Appendix G titled "Soils, Water and Waste Technical Study" notes that three high risk areas would require appropriate remedial measures as well as the preparation of an Environmental Management Plan to manage the contamination recorded. No details of the remedial measures proposed was found.	Council requests the applicant / WestConnex undertake a contamination assessment in accordance with the requirements of SEPP55 and the Contaminated Lands Management Act, and include a Section B Site Audit Statement.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Stormwater systems / Water quantity The application should protect and enhance existing stormwater systems to reduce the current pollutant load and to mitigate against the additional load from the new lanes.	Vater quantitythat stormwater is discharged directly to Duck River (left) and Haslams Creek (right) without any pre- treatment (see photo below taken 15/10/13) /	Section 8.5.3 – Assessment of potential impacts	Section 8.5.3 of the EIS states that, the increase in impervious area will not have an adverse impact on flooding. The increase in flood levels is negligible. However, stormwater generated from a portion of M4 widening will be directed to Council's system prior to discharge into the river/creek. The EIS has not identified this. This additional runoff has significant impact on the road drainage network	Council requests that the applicant / WestConnex provide works or funding to ensure the control of additional runoff to pre-developed conditions up to 100 year ARI event, to minimise flooding in Council's system.
		Section 6.3.4 – Bridge / viaduct works <i>Bridge over</i> <i>Haslams</i> <i>Creek</i>	There is no mention of the bridge over Haslams Creek where an additional lane will be claimed from median strip.	Council requests that the applicant / WestConnex provide details of measures to remediate current and prevent future heavy erosion from existing stormwater discharge under the bridge.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
		Section 7.4.2 – Issues raised by government agencies and councils Table 7.1		
	It should be noted that the wetlands associated with Haslams Creek (e.g. Teal Pond) is managed by Sydney Olympic Park Authority (SOPA). Accordingly, consultation should be undertaken with SOPA.			
Water quality The application should identify any impacts on Water quality, and address how any impacts will be managed.	The Hawkesbury Nepean Catchment Management Authority has a Decision Support System for water quality within Sydney Harbour that could be used to assess the impacts. Council and its partners	Section 5.3.5 – Drainage and operational water quality Section 7.4.2 – Issues	The M4 Widening / WestConnex project will have a long term environmental impact on the Parramatta River catchment. The Parramatta River Catchment Group can model the long term impact of the project on the water quality of the local water bodies and the Parramatta River with and without the proposed water quality treatment measures. But it will be important to accurately monitor the impact of the project on water quality both during	Council requests the applicant / WestConnex be required to provide funding for ongoing water quality monitoring of the local water bodies and the Parramatta River. The PRCG would collate

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
	have monitoring programs, water quality and riparian zone studies that can provide additional information on the condition of the catchment.	raised by government agencies and councils Table 7.1	construction and in the long term.	this information and report back to WestConnex and the community.
		Section 5.3.5 – Drainage and operational water quality	Water quality control measures have been identified in section 5.3.5. A GPT and some swales have been proposed within the Auburn LGA and the final locations will be identified as part of the final design. The report states that existing floating boom on Haslams Creek, will be used as a mechanism. Council notes that the boom is maintained by SOPA.	Council requests the applicant / WestConnex contact SOPA regarding existing floating boom on Haslams Creek
		8.4.5 – Environmental management measures Table on Page 8-82 SWW-5	The document states that measures to "optimise pollution mitigation would include vegetated swales with rock check dams and spill management basins where space permits."	Council requests information about what is proposed to optimise pollution mitigation where space does not permit these large scale measures, i.e. at previous M4 bridge

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
				crossings surface water runoff is discharged without treatment from a height. This achieves no mitigation of increased pollutant load and contributes to increased scour of river banks.
		8.4.5 – Environmental management measures Table on Page 8-80 SWW-2 and Page 8-81 SWW-3	Environmental management measures are prefaced with "These measures <u>may</u> include"	Council requests the DP&E enforce these measures either by requesting the applicant / WestConnex to change note from "may" to "will" or conditioning these actions as part of any approval.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Riparian zone The application should be required to maximise opportunities for environmentally sensitive seawall design, particularly where new infrastructure and construction occurs in or around the riparian zone	The project should seek to protect the current conditions of the local catchment or provide opportunities where there is a channel, to return the reach to a vegetated condition. The construction and the installation of the new pylons will disturb the existing river conditions including vegetation, bank condition, sediments and flows. The additional traffic flow will increase the run-off and pollutant load into the catchment.	Section 7.4.2 – Issues raised by government agencies and councils Table 7.1	There is no mention of maximising environmentally sensitive seawall design. Vegetated swales with rock check dams and spill management basins are proposed "where space permits" and "riparian vegetation along the main wildlife corridor (Duck River) will be protected during construction works where possible with any affected areas to be rehabilitated". This does not address the stability of the river bank directly under the additional lanes of the M4 (which will be significantly overshadowed making it difficult for local flora to become established).	Council requests that the applicant / WestConnex employ environmentally sensitive seawall design such as root wad, rock, branch bundle, jute mat, brush matting, logs and stakes, etc.

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Construction works impacts The application should indicate where construction access is required, and identify how these will be managed and remediated.	Council is concerned that access points through vegetated and environmentally sensitive areas required for construction of this project may have an impact. It is important that any environmental impact caused as a result of construction access is identified, managed and remediated.	Section 6.4 – Temporary compounds and ancillary sites (page 6- 11)	Potential site compound 7 Deniehy Street Compound is an existing compound/storage facility with poor and degraded temporary environmental controls.	Council requests that the applicant / WestConnex reinstate all site compounds with robust permanent environmental controls.

BIODIVERSITY

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Existing vegetation The application should be required to identify impacts on existing vegetation, and maximise opportunities for improving	Council wishes to be able to identify where the proposal will have an impact on existing vegetation such as mangroves along the Duck River.	8.6.4 – Environmental management measures Table on page 8-106 FF-10 – Impacts on	Table item FF-10 (page 8-106) states that riparian vegetation <i>"will be protected during</i> <i>construction where possible with any affected</i> <i>areas to be rehabilitated"</i> . Auburn and Parramatta Council are conducting bush regeneration and bank stabilisation works along the Duck River.	Council requests that any rehabilitation works be in accordance with the recommended actions of the Parramatta River Estuary Coastal Zone Management

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
		Riparian vegetation Section 7.4.2 – Issues raised by government agencies and councils Table 7.1		Plan and as such include bank stabilisation works and bush regeneration. Bank stabilisation works should be in accordance with environmental sustainable seawall design principles.
Roadside planting The application should identify proposed roadside plantings and plant species.	Council would encourage the applicant to plant species endemic to the area.	Not addressed in Section 7.4.2 – Issues raised by government agencies and councils and Table 7.1	There is no mention of roadside plantings in the EIS.	Council requests that the applicant / WestConnex provide information about any proposed roadside plantings or specifically state if no plantings are proposed.

HERITAGE

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
N/A	N/A	N/A	N/A	N/A

AIR QUALITY

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
Emissions The application should be required to identify and address the likely impact of emissions as a result of the proposal.	The current draft DGRs in relation to air quality are very general and do not specifically ask the applicant to address the likely impact of emissions.	Section 8.9 – Air quality Section 7.4.2 – Issues raised by government agencies and councils Table 7.1	The EIS states that no specific emission management measures are considered necessary for operation, due to minimal impact from emission. However, it is noted that emissions along Parramatta Road are predicted to increase. Extract from Section 8.9, page 8-125: "Modelling shows the project would reduce traffic emissions along the M4 Motorway, and would also generally reduce emissions beside the motorway. Some small increase in emissions would occur where the widened motorway is closer to receptors. A small increase in emissions is also predicted along Parramatta Road." The project-specific management measures procedures described to minimise or mitigate air quality effects during construction are considered acceptable.	Council requests that the applicant / WestConnex address the issue of increased emissions along Parramatta Road, by identifying infrastructure upgrades to the road and intersections in the detailed design stage of the project, and that funding sources for these upgrades be provided by the applicant.

SOCIAL AND ECONOMIC

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
N/A	N/A	N/A	N/A	N/A

ENVIRONMENTAL RISKS ANALYSIS

Requested addition to DGRs	Justification / comments	EIS reference	EIS statement	Council response
N/A	N/A	N/A	N/A	N/A