

INQUIRY INTO CROSS CITY TUNNEL

Organisation: Woollahra Municipal Council
Name: Mr Warwick Hatton
Telephone: 9391 7121
Date Received: 18/01/2006

Theme:

Summary

SUBMISSION
TO
THE JOINT SELECT COMMITTEE
ON THE CROSS CITY TUNNEL

I refer to the establishment of the Joint Select Committee on the Cross City Tunnel and your invitation to Council dated 8 December 2005 to make a submission on the issues raised by this enquiry.

In the Terms of Reference for the enquiry, Council wishes to comment in relation to items 1(b), 1(e) and 1(f) and to address other related matters in accordance with item 1(g). Council does not wish to comment on items 1(a), 1(c), 1(d) and 1(e).

The exercise of proper consultation and communication for this project was of major concern to Council throughout the planning/design stages of the Cross City Tunnel and although numerous submissions/requests were submitted by Council a significant proportion of these requests have not been adequately addressed. It is considered that the concerns expressed by Council, its officers, and the residents of Woollahra were not properly considered in the preliminary stages of this project and, as a consequence, the Cross City Tunnel has and will continue to have a significant adverse impact on the Municipality as a whole and on the amenity of its residents.

Council has previously made two formal submissions in respect of the Cross City Tunnel (see attachments) as detailed below:

- The first submission dated 4 October 2000 was made following release of the first Environmental Impact Statement for the Cross City Tunnel proposal on 2 August 2000.
- The second submission dated 29 August 2002 followed the release of the Supplementary Environmental Impact Statement for the modified Cross City Tunnel Proposal.

The comments and concerns expressed in these submissions were generally ignored or were dismissed by the RTA without any further dialogue with Council. The following supplementary information is provided for consideration:

- i. It is considered that Council's first submission was not carefully considered by the RTA and that numerous matters of concern to this Council and the residents of the Municipality were not addressed. Whilst a letter of acknowledgement was forwarded to Council on 30 November 2000, the numerous matters raised were neither acknowledged nor addressed as the subject of further consultation. In its response of 30 November 2000 the RTA simply advised that all submissions would be addressed in a Representations Report to be submitted to the Department of Urban Affairs and Planning for approval of the project.

Subsequently in May 2001 the RTA released the Preferred Activity Report for this project which addressed only one of Council's concerns, namely, the likely increase in traffic through the Paddington precinct. The remaining matters which had been raised

by Council in its submission, which included the impact (traffic and environmental) of this project on the whole Municipality, were neither acknowledged nor discussed further with Council.

- ii. Council's second submission reiterated the matters raised in its first submission and elaborated in greater detail the concerns previously expressed by Council over the impact of this project on the Municipality.

It is considered that this submission was also not correctly or reasonably addressed by the RTA. Whereas it would be reasonable to expect, as a consequence of Council's detailed submission, that further consultation would have taken place between the RTA and Council no further consultation occurred and on 19 December 2002 BHBB Cross City Tunnel Joint Venture advised that the project had been approved and would commence on 6 January 2003.

- iii. Council on numerous occasions requested that it be consulted on matters which will affect this Municipality, and to this end, Council requested that a Community Liaison Group (CLG) be formed to consider the impact of the Cross City Tunnel on this Municipality.

It should be noted that four(4) CLG's were formed by the RTA and yet no CLG was formed for the Woollahra Municipality even though it borders on the eastern portal of the Cross City Tunnel. Woollahra Council was advised in writing by the RTA on 2 January 2003 that it was not to be represented on any of these CLG's. In its letter the RTA stated that the CLG's were established to address the construction impacts in the immediate areas only and that it was not intended to include representatives on the CLG's from areas remote from the construction site.

Whilst Council was eventually invited to attend meetings of the Kings Cross CLG, this only occurred after several months of complaint by Council and representations from the Paddington Society, which curiously was a member of the CLG whilst Council was not.

- iv. Between 2000-2005 Woollahra Council referred to the RTA and/or the BHBB Cross City Tunnel Joint Venture numerous complaints and submissions which were received from local residents or community groups and to my knowledge not one of these referrals has been answered. These submissions should have become the subject of consultation by the RTA and yet it would appear that these comments have gone unassessed and unanswered.
- v. To date the following critical matters which were raised in Council's two formal submissions and which have been the subject of repeated requests to the RTA remain unanswered. The lack of consultation on these matters seriously brings into question the effectiveness of the community consultation process which has been applied to this project:

- Impact on the Municipality
Whilst some minor traffic calming measures have been incorporated in the Paddington precinct, the effect of the Cross City Tunnel on the whole

Municipality remains unresolved. The Council has repeatedly advised that adverse impact will occur in Rushcutters Bay, Paddington, Darling Point, Edgecliff, Double Bay and Bellevue Hill. Despite the RTA's own analysis that traffic volumes on New South Head Road and Ocean Street will rise significantly and impact significantly on adjoining roads and on alternative, non-classified routes, no action has been proposed by the RTA to accommodate the anticipated traffic volumes.

- Modified Tolling Arrangements

In its second submission, Council identified that the differential toll charges between the Eastern Distributor entry to the Cross City Tunnel(\$3.50) and entry to the tunnel from the Rushcutters Bay portal(\$1.10) would result in motorists from the south and south-east accessing the tunnel via alternate routes through the Woollahra Municipality to the Rushcutters Bay portal. Council recommended that a second eastern portal be constructed at Driver's Triangle at Moore Park with direct access to the Cross City Tunnel (via the northern end of the Eastern Distributor) and that the toll for this entry be the same as the entry toll at Rushcutters Bay.

This matter represented a significant improvement to the proposal and yet no further consultation on the matter was made by the RTA.

- Modified Access via Moore Park

Council requested the RTA to investigate access to the Cross City Tunnel from the Moore Park portal into the Eastern Distributor. This request dealt specifically with the internal layout of this tunnel entry which prevents motorists from crossing over to the Cross City Tunnel lanes with safety, and therefore forces motorists to travel overland to the Rushcutters Bay portal.

It should be noted that the above two matters have now become the subject of considerable public debate. Had the RTA given proper and due consideration to Council's advice in the first instance then the final layout of the Cross City Tunnel would have been truly representative of the community's requirements.

- New South Head Road

Despite being recognised in its own reports and being forewarned in Council's submissions, the RTA has not addressed the significant delays extending through Rushcutters Bay and Double Bay from the eastern portal of the tunnel. No advice has been received in relation to the proposed level of service for traffic signals in this section of New South Head Road. Nor has any advice been received in relation to the RTA's plans to deal with the anticipated, and now evident, congestion on New South Head Road. This congestion of a major artery has a cumulative effect on adjoining local roads (see below).

- Localised Impact – Darling Point

Council repeatedly advised that as a direct result of the predicted increased traffic on New South Head Road, significant congestion will occur in New South Head Road and the Darling Point precinct will become isolated. Darling Point is bounded wholly by Sydney Harbour and New South Head Road and any increased congestion in New South Head Road will result in unacceptable levels

of congestion within this precinct. This congestion, as predicted by Council, appeared immediately upon the opening of the tunnel with delays being experienced in exiting Darling Point on to New South Head Road of up to 30 minutes.

- Localised Impact – Paddington

The RTA's own findings show that traffic volumes on Ocean Street will increase significantly and that because existing signalised intersections along Ocean Street are operating at capacity it is likely that traffic will divert through the Paddington precinct to access the Cross City Tunnel. No further action has been proposed by the RTA to address the inevitable and significant increases in traffic through the Paddington residential area arising from congestion in Ocean Street.

- Conditions of Approval 59 & 61

These conditions cover the proposed monitoring of neighbouring areas following the opening of the Cross City Tunnel. Council repeatedly requested that this monitoring cover Rushcutters Bay, Paddington, Darling Point, Edgecliff, Double Bay and Bellevue Hill, as all of these areas would be affected by the tunnel.

As a result of the report of the Director General of the Department of Urban Affairs and Planning in September 2001 the Paddington precinct was included in Condition 59 for limited Local Area Traffic Management treatment and was included in Condition 61 for future monitoring. None of the other areas requested by Council were considered further and therefore no recourse now exists for Council to apply for funding for traffic management measures which are necessarily introduced as a direct consequence of the adverse impact of the tunnel on these precincts.

In summary, Council considers that the public consultation process for the Cross City Tunnel project was not conducted meaningfully. Public comments/views were either ignored or were brushed aside and decisions were made without due consideration of the public's viewpoint. This is exacerbated by the fact that the views of Council, which is a representative for the whole Municipality of Woollahra, were also ignored or brushed aside and that the Council as a representative of the community was denied a proper forum (i.e. a Community Liaison Group) to address its viewpoints and the concerns of the local community.

Council Ref: 583.G

Your Ref:

4 October 2000

RTA Project Manager
Cross City Tunnel EIS
PO Box 248
CONCORD WEST NSW 2138

Dear Sir/Madam,

Proposed Cross City Tunnel

I refer to the Cross City Tunnel proposal and the Environmental Impact Statement for this project, which has recently been on Public Exhibition.

I advise that this Council supports, in principle, the reduction of through traffic through the centre of the Sydney CBD and the resultant improvements in amenity and safety that would occur within the CBD. It is however, very concerned about the adverse traffic and associated impacts that such a proposal would have on this Municipality, especially the Paddington and Woollahra areas.

Specific areas of concern to Council are as follows:

Assessment of the likely Impact on the Municipality

In preparing the Environmental Impact Statement for the proposed Cross City Tunnel project, it seems that little regard has been given to the potential or likely impact that the proposal would have on the Woollahra Municipality. For example, Chapter 13 on Local Impacts: eastern precinct, does not incorporate any assessment of the potential or likely impact of the proposal on this Council's area which is located immediately to the east and south of the proposed tunnel entrance / exit.

Some mention is made in Chapter 9 - Regional Impacts, of some of the possible impacts of the proposal on the Paddington area however these references are very generic and indefinite.

Traffic and Associated Impact on the Woollahra Municipality

As stated in the Environmental Impact Statement, the introduction of the Cross Sydney Tunnel into the existing road network will result in a redistribution of trips to take advantage of improved travel times.

Because of the location of the proposed tunnel entrance at Rushcutters Bay, traffic flows on all possible traffic routes radiating from the tunnel entrance/exit in an easterly through to a southerly direction are likely to increase as a result of the Cross City Tunnel. This additional traffic is anticipated to occur on the following major street systems in the Woollahra Municipality:

- New South Head Road
- Ocean Street, Woollahra
- Edgecliff Road, Woollahra
- Existing north south and east west corridors through the Paddington and Woollahra Areas

These Street systems are already heavily trafficked and congested. Council is continually receiving requests from the community to reduce traffic flows in these streets. This is particularly so in relation to Ocean Street, Edgecliff Road and the through traffic streets of Paddington and Woollahra, which are **local streets** and **not** State Roads and are not designed to carry such traffic flows.

Traffic flow on New South Head Road, which is the primary feeder road to the proposed Cross City Tunnel, is already in excess of its nominal capacity. This was the case in 1998 prior to the recent introduction of Transit lanes on New South Head Road. Any increase in Traffic on New South Head Road therefore, as a result of the Cross City Tunnel, will cause traffic congestion and delays on New South Head Road.

No assessment has been made in the Environmental Impact Statement as to the level of service that will result for the signalised intersections along New South Head Road and Ocean Street due to the Tunnel proposal. The level of service of some of the intersections such as that at the intersection of New South Head Road and Ocean Street, Woollahra is already poor during the morning and afternoon peak hours. It can only be assumed that the introduction of the Cross City Tunnel will only further degrade this level of service. This traffic congestion and delay is going to make alternative traffic routes through local streets such as those that exist through Paddington and Woollahra, attractive alternative traffic routes to the main road system. This will result in increased traffic flows in these local residential streets and a resultant degrading of the amenity and safety of these conservation areas.

The Environmental Impact Statement does make reference to a predicted increase in through traffic trips across Paddington of about 16% compared to that without the tunnel and potential traffic increases in Glenmore Road / Gurner Street of 50%. Apart from this, very little other specific traffic data has been provided in relation to likely traffic impact in the area. Figures 9.6–9.8 of the report shows a predicted decrease in traffic in Ocean Street and New South Head Road as a result of the Cross City Tunnel however it cannot be seen how this is likely to occur. It can only be assumed that there has either been some mistake in the modelling of traffic flows along this route or that due to the limited capacity of Ocean Street and New South Head Road, alternative through traffic routes through Woollahra and Paddington will be more desirable.

As has been stated in the Environmental Impact Statement, Council and the residents of the Paddington and Woollahra Area are already concerned about the volume of through traffic that currently avoids the main road system and utilises the local streets of Paddington and Woollahra to travel to and from the Central Business District. Residents of these areas want this traffic redirected back onto the major road system.

Although it is stated in the Environmental Impact Statement that the 16% increase in through traffic in Paddington would only bring the traffic levels back to that which existed in 1998 due to reduced traffic volumes resulting from the opening of the Eastern Distributor, Council refutes this conclusion. Council is not aware of any comprehensive traffic data that is currently available that quantifies reduced traffic flows in Paddington due to the opening of the Eastern Distributor.

The Environmental Impact Statement states that Council is yet to make a decision in relation to the options considered to restrict existing through traffic in Paddington. This is **not** the case. Council did resolve to introduce a traffic management scheme to reduce through traffic in Paddington however this scheme was **not** approved for implementation by the RTA as the RTA was concerned that the traffic redirected back onto the main road system would affect the overall performance of this system. If this is the case, then there is no guarantee that any Traffic Management Scheme developed after the introduction of the Cross City Tunnel to reduce through traffic in local streets, as recommended in the Environmental Impact Statement, will be approved by the RTA for implementation. There is also no commitment in The Environmental Impact Statement as to who will pay for such a scheme if approved by the RTA.

For reasons listed above, it is considered that the proposal to introduce the Cross City Tunnel and to then monitor the local street network and introduce traffic management measures, if required, is totally inappropriate. It is considered that the likely traffic impact on the local street network of Paddington and Woollahra together with actions to mitigate any adverse Traffic and associated impacts needs to be determined now so that these actions can be implemented in conjunction with the construction of the Cross City Tunnel. It is only through this process can the interests of the residents of this Municipality be fully protected.

Impact During Construction

Similar traffic concerns to that listed above exist for the Paddington and Woollahra areas during the proposed construction stage of the works. Not only will there be an increase in the number of construction vehicles using the local streets of Paddington and Woollahra, it is also considered that there will be, at different stages of the project, a redistribution of some traffic from the main roads system to the local traffic routes through these areas. This redistribution will occur mainly due to delays and congestion that will occur on the New South Head Road /William Street corridor.

For reasons listed previously in this submission, any redistribution of traffic to the residential streets of the Paddington / Woollahra area, is considered to be undesirable, even if for short periods only during the proposed construction of the Cross City Tunnel.

No consideration appears to have been given to measures that might be employed to reduce the impact of additional traffic in the Paddington and Woollahra areas during the construction stages of the works.

Air Quality, Noise and Safety

Councils major concerns in relation to these issues are those that are linked with increased traffic volumes and traffic congestion in local residential streets. Increased traffic volumes in local residential streets will result in increased pollution and traffic noise and reduced safety for residents. All of these are results are undesirable in a residential environment such as that which exists in the Paddington and Woollahra Areas.

Public Transport

It is disappointing to note that as part of this project, no strategies have been identified or are proposed to be implemented, to increase the use of public transport and decrease motor vehicle usage. It is considered that such strategies should form part of this project.

Summary

In summary, I advise that Woollahra Council is very concerned about the possible traffic and associated impacts that the introduction of the Cross City Tunnel would have on this Municipality and its residents. It urgently requires that prior to any further decisions being made in relation to the implementation of this proposal that a thorough and proper assessment be carried out to determine and quantify the impacts that this proposal would have on this Municipality, especially the suburbs of Paddington and Woollahra. Once this has been determined, actions that may be available to mitigate this impact need to be identified and implemented prior to the commencement of the construction of the Cross City Tunnel. Unless these impacts can be nullified, Council may have no option but to oppose the construction of the Cross City tunnel project.

Your careful consideration of Councils concerns in relation to this project is requested. Council is prepared to work with the RTA on this project in the hope that a solution, which is satisfactory to all parties, can be obtained. Your response in relation to this matter would be appreciated.

Yours faithfully

Greg Stewart
Manager Public Infrastructure

Council Ref: 583.G
Your Ref:

29 August 2002

Mr Howard Penn
RTA Project Services Manager
Cross City Tunnel EIS
PO Box 380
Rozelle NSW 2039

Facsimile No: 9352 9531

Dear Mr Penn,

**Supplementary Environmental Impact Statement for the Modified Cross
City Tunnel Proposal**

I refer to the Supplementary Environmental Impact Statement for the modified Cross City Tunnel Proposal that has recently been on display for public comment.

Woollahra Council supports, in principle, the reduction of through traffic in the centre of the CBD and the resultant benefits that would be gained within the CBD. Notwithstanding this however, Council objects to the modified Cross City Tunnel Proposal because of the adverse traffic and associated impacts that the proposal would have on this Municipality, especially the suburbs of Paddington, Woollahra, Darling Point, Edgecliff and Double Bay.

The proposed modified Cross City Tunnel, if introduced into the existing road network, would result in a redistribution of traffic flows. The specific areas of concern for the modified Cross City Tunnel Proposal are mainly the same as for the original Cross City Tunnel Proposal, which were expressed in Council's submission on the EIS for the original proposal, a copy of which is attached. Whilst the areas of concern remain the same, because of the additional 15,000 vehicles a day forecast to use the modified Cross City Tunnel, Council's concerns are even greater for this modified Cross City Tunnel Proposal.

Woollahra Council objects to the modified Cross City Tunnel Proposal on the following grounds:

1. Traffic and Associated Impact on the Woollahra Municipality

As for the original proposal, because of the location of the proposed tunnel entrance at Rushcutters Bay, traffic flows on all possible traffic routes radiating from the tunnel entrance/exit in an easterly through to a southerly direction will increase as a result of the modified Cross City Tunnel proposal. This additional traffic is anticipated to occur on the following major street systems in the Woollahra Municipality:

- New South Head Road
- Ocean Street, Woollahra
- Edgecliff Road, Woollahra
- Existing north, south and east / west corridors through the Paddington and Woollahra Areas
- Existing east / west corridors through the Double Bay and Darling Point Areas

These street systems are already heavily trafficked and congested. Council is continually receiving requests from the community to reduce traffic flows in these streets. This is particularly so in relation to Ocean Street, Edgecliff Road, the through traffic streets of Paddington and Woollahra and the east/west corridor through Double Bay and Darling Point areas. These streets are **local residential streets** and **not** State Roads and are not designed to carry such traffic flows.

1.1 Predicted Traffic Flows -New South Head Road, Rushcutters Bay

Traffic flow on New South Head Road, which is the primary feeder road to the proposed modified Cross City Tunnel, is already in excess of its nominal capacity. This was the case in 1998, prior to the introduction of Transit Lanes on New South Head Road. Any increase in traffic on New South Head Road therefore, as a result of the Cross City Tunnel, will cause traffic congestion and delays on New South Head Road. This traffic congestion will also have a negative impact on the performance of the bus transport system.

New South Head Road currently carries approximately 73,000 vehicles per day, which is some 13,000 vehicles per day more than its estimated carrying capacity. With the introduction of the modified Cross City Tunnel Proposal, it has been forecast that, by 2016, daily traffic volumes on New South Head Road would be 101,000 vehicles per day. As this would be approximately 70 % above the estimated carrying capacity of New South Head Road, it must result in major traffic congestion and delays on New South Head Road and encourage motorists to find alternative "rat runs" through the adjoining residential streets of Paddington and Darling Point.

1.2 Predicted Traffic Flows - Ocean Street, Woollahra

Traffic flows on Ocean Street, Woollahra, as a result of the proposed modified Cross City Tunnel proposal, have been forecast to increase from a year 2000 base figure of 19,600 vehicles per day to 38,700 vehicles per day by the year 2006. This represents a 97% increase in traffic flow in Ocean Street in the 6-year period between 2000 and 2006. This also means that the benefits gained due to reduced traffic flows resulting from the recent construction of the Eastern Distributor will be lost as a result of this proposal.

Traffic counts carried out by Council, for the week commencing 20 August 2002, have shown that the current traffic flow in Ocean Street just south of New South Head Road is 28,840 vehicles per day. This is 9,240 vehicles per day or 47% more than the base figure of 19,600 vehicles per day used in the traffic modelling for the project.

On the basis that the predicted traffic increase in Ocean Street, as a result of the modified Cross City Tunnel Proposal, is correct, then the likely traffic flows in Ocean Street in 2006 are more likely to be 48,000 vehicles per day rather than the forecast 38,700 vehicles per day. This is much greater than that forecast in the Environmental Impact Statement. They are also much greater than the traffic flows that existed in Ocean Street prior to the opening of the Eastern Distributor when traffic "rat running" through the residential streets of Paddington and Woollahra was prevalent due to the traffic congestion and delay on Ocean Street. These predicted traffic volumes also exceed the carrying capacity of Ocean Street. This increased traffic flow will also have a negative impact on the performance of the bus route along Ocean Street.

1.3 Signalised Intersections - Level of Service

No assessment has been made in the Environmental Impact Statement as to the level of service that will result for the signalised intersections along New South Head Road and Ocean Street due to the modified tunnel proposal. The level of service of some of these intersections, such as that at the intersection of New South Head Road and Ocean Street, Woollahra, is already poor during the morning and afternoon peak hours. It can only be assumed that the introduction of the modified Cross City Tunnel Proposal will further degrade this level of service.

This traffic congestion and delay is also going to make alternative traffic routes through local streets such as those that exist through Paddington, Woollahra, Darling Point, Edgecliff, and Double Bay, attractive alternative traffic routes to the main road system. This will result in increased traffic flows in these local residential streets and a resultant degrading of the amenity and safety of these conservation areas.

2. Options to reduce impacts

As can be seen from the information above, the modified Cross City Tunnel Proposal will have a major adverse traffic impact on this Municipality and its residents and Council objects to the proposal for these reasons.

If, however, it is determined to grant approval to the modified Cross City Tunnel Proposal, Woollahra Council requests that serious consideration be given to the following options to reduce the Traffic Impact in the Woollahra Council Area.

2.1 Modified tolling arrangements

A large percentage of the predicted additional traffic at the eastern portal of the proposed Cross City Tunnel will originate in areas to the south and south east of this Municipality. A lot of this traffic will be travelling to the eastern portal of the tunnel because they will be unable to access the Cross City Tunnel by way of the Eastern Distributor from the Drivers' Triangle at Moore Park. In addition, traffic travelling north to the Harbour Tunnel from these areas will also be travelling to the eastern portal of the Cross City Tunnel rather than using the Eastern Distributor to the harbour tunnel. This is because the toll to the Harbour Tunnel via the Cross City Tunnel Route at \$1.10 will be less than that via the Eastern Distributor at \$3.50.

If access was provided to the Cross City Tunnel by way of the eastern Distributor from Drivers' Triangle and the differential tolling for the two alternative routes to the Harbour Tunnel removed, it is considered that the additional volume of traffic, travelling through the Woollahra Municipality to gain access to the Cross City Tunnel (if approved) and Harbour Tunnels, would be significantly reduced. The adverse traffic and associated impact on the Woollahra Municipality and its residents would also be reduced. For this reason, Council urges that any approval granted for the modified Cross City Tunnel Proposal be conditional upon removal of the disincentive to the use of the Eastern Distributor as a means of access to the Cross City Tunnel and Harbour Tunnel.

2.2 Improved access to the Eastern Distributor and CBD

The proposed No Right Turn restrictions at the intersection of William Street and Palmer Street, Kings Cross. This turning restriction will require a more circuitous route to be taken to gain access to the Eastern Distributor southbound for residents of the Woollahra Council Area. As a result of this restriction, the surface cross-suburb routes through Paddington and Woollahra will be more desirable. This will result in additional through-traffic in these suburbs as well as the associated adverse affects that this additional traffic flow will have on the residential amenity of these areas.

The proposed changes to the width, number and allocation of traffic lanes together with the proposed turning restrictions in William Street, Kings Cross.

These restrictions will result in restricted access and additional travel times to the CBD and nearby suburbs as well as traffic delays in reaching these areas for residents of the Woollahra Council Area. It will also mean that when the Cross City Tunnel traffic lanes are closed to vehicular traffic, severe traffic congestion and delays will be experienced.

To overcome the above concerns, it is proposed that:

1. a more easily accessible route to the Eastern Distributor, southbound off William Street similar to the current arrangements, be provided as part of this project, and
2. the width, number and allocation of traffic lanes and turning restrictions on William Street be reviewed to provide better vehicular access to the CBD and surrounding suburbs by residents east of the Kings Cross Area as well as providing satisfactory alternative means of travel when the Cross City Tunnel traffic lanes are closed to vehicular traffic.

2.3 Conditions of approval

In addition, there is a number of additional commitments and conditions that Council considers must be applied to any approval granted to the modified proposal in order to reduce the impact on the Woollahra Municipality and its residents. These are either additional requirements to the conditions of approval already granted for the approved Cross City Tunnel project, or modifications and alterations required to the traffic and air emission conditions of approval, as follows:

i. Condition 25 of current approval

The \$5 million contingency funds required to be set aside are considered to be inadequate and should be increased to \$10 million.

ii. Condition 27 of current approval

This condition should be amended to include a representative of Woollahra Municipal Council on the Public Transport Committee.

iii. Condition 56 of current approval

This condition should be amended to require the Proponent to conduct the traffic monitoring prior to the commencement of any construction on the modified tunnel project.

The streets in the Woollahra Municipality that should be included on the traffic-monitoring program are as follows:

Ocean Street, Woollahra
New South Head Road at Rushcutters Bay and east of Ocean Street

Syd Einfeld Drive, Woollahra
Oxford Street, Paddington
Glenmore Road near New South Head Road, Edgecliff
Brown Street between MacDonald Street and Neild Ave, Paddington
Boundary Street, Paddington
Neild Avenue, Paddington
McLachlan Avenue, Paddington
Cutler Viaduct, Paddington
Hargrave Street, Paddington
Elizabeth Street, Paddington
William Street, Paddington
Jersey Road between Hargrave and Sutherland Streets, Paddington
Ormond Street, Paddington
Glenmore Road near Oxford Street, Paddington
Underwood Street at Oxford Street, Paddington
Mona Road, Darling Point
New Beach Road, Darling Point
Greenoakes Avenue, Darling Point
Edgecliff Road, Woollahra
Manning Road, Double Bay
Bellevue Road, Double Bay
Victoria Road, Bellevue Hill

iv. Condition 57 of current approval

This should be amended to refer to local as well as the regional road network.

v. Condition 59 of current approval

This condition should be amended to require the Proponent within three months of approval to model the traffic impact of the approved project on the local and regional road network of Paddington, Woollahra, Darling Point, Edgecliff and Double Bay. Following this traffic modelling exercise, the Proponent must prepare and implement Local Area Traffic Management (LATM) measures for local roads identified as having increased travel speeds or traffic volumes in excess of 5% of current volumes. The traffic modelling and the implementation of the LATM measures are to be carried out in accordance with the consultation process specified as part of this condition of approval. They are also to be carried out at full cost to the Proponent as soon as practicable after finalising the LATM consultation process.

vi. Condition 60 of current approval

This condition should be amended to require the implementation of the LATM measures including any associated construction works to be fully completed prior to the operator collecting any toll.

vii. Condition 61 of current approval

This condition should be amended to also require the Proponent to monitor traffic changes on regional and local roads/streets the suburbs of Paddington, Woollahra, Darling Point, Edgecliff and Double Bay. It should also require the Proponent to prepare and implement, at its cost, traffic management measures in these suburbs where the traffic monitoring indicates:

- a) increased travel speeds or traffic volumes on local roads in excess of 5% of current volumes, and
- b) increased travel speeds or traffic volumes on regional roads in excess of 5% of that predicted in the traffic reports attached to the EIS

viii. Additional condition of approval

In order to protect the environment and amenity of the adjoining residents, the Roads and Traffic Authority should be required, as a condition of any approval for this project, to give an undertaking to Woollahra Municipal Council that no further Clearway, Bus Lane or Transit Lane restrictions will be introduced in New South Head Road and/or Ocean Street, Woollahra as a direct result of any approval for this project.

ix. Additional condition of approval

In order to protect the environment and amenity of the adjoining residents, the Proponent should be required to implement an ongoing and continuous air quality and noise monitoring programme within the suburbs of Darlinghurst, Rushcutters Bay, Paddington, Woollahra, Darling Point, Edgecliff and Double Bay as well as at the eastern portal of the tunnel to ensure that all emissions from the proposed Cross City Tunnel comply with all relevant EPA requirements. If the emissions fail to comply with all the relevant EPA requirements, then the Proponent should be required to immediately install appropriate filtering and noise suppression systems to the tunnel to ensure compliance with the EPA requirements.

x. Additional condition of approval

In order to ensure public safety, the Proponent should be required to prepare, prior to the commencement of any construction on the modified Cross City Tunnel project, an Emergency Management Plan for the Tunnel. This Emergency Management Plan should detail the measures that need to be put in place should there be an emergency in the tunnel or a need to close the tunnel to vehicular traffic. Safe and satisfactory alternative vehicular traffic routes will need to be identified in case there is a need to redirect traffic due to a closure of the tunnel.

xi. Additional condition of approval

As traffic flows, along New South Head Road, Edgecliff, will significantly increase as a result of this proposal, the Proponent should be required to provide improved pedestrian crossing facilities in New South Head Road, Edgecliff between Darling Point Road and Ocean Avenue. These facilities should be provided at the cost of the Proponent.

In summary, Woollahra Council objects to the increased traffic, reduced air quality and other associated impacts that the introduction of the modified Cross City Tunnel Project would have on this Municipality and its residents. If the proposal is to be approved, however, the conditions of approval for the project should be, as a minimum, the same as those applying to the current approved project and reinforced by the above recommended alterations and additions.

It is understood that one of the suggestions that is to be made, in response to this public exhibition process, is that the eastern portal of the tunnel be relocated further to the east than that proposed in the current modified Cross City Tunnel Proposal. Woollahra Council would strongly oppose the relocation of this portal, which would have a negative impact on the amenity and air quality of this Municipality.

Your careful consideration of Council's concerns in relation to this project is requested. Council is prepared to work with the Roads and Traffic Authority on this project in the hope that a solution, which is satisfactory to all parties, can be obtained.

Yours sincerely



GARY JAMES
GENERAL MANAGER