### 5.3.2. Department of Transport (Submission 737)

The Department of Transport (DoT) prepared a submission in support of the Project. The submission outlined the recent incorporation of VicRoads and Public Transport Victoria (PTV) into DoT, reaffirmed their involvement in the development of the Project through the TRG and outlined the relationship of DoT to the Major Transport Infrastructure Authority (MTIA) which is the proponent to the Project[18].

DoT's submission also highlights their role in assessing and responding to submissions, stating: *"this includes providing clarity on transport-wide matters that do not fall within the ambit of MTIA's remit. This includes planning and transport system integration, the inter-relationship between the Project and the broader transport network."*

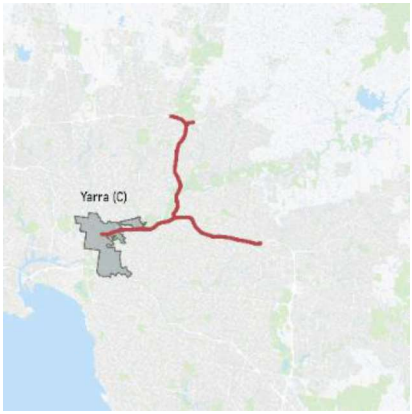
## 5.4. Response to Local Government Submissions

The following section provides summaries and responses of the submissions made by Local Government authorities. They have been ordered chronologically by submission number.

### 5.4.1. Yarra City Council (Submission 386)

#### Summary

Yarra City Council prepared a submission which outlines the anticipated impacts of the Project on the municipality and how the *EES* responds, followed by a summary of the strategic outcomes Council seeks from the Project. Most of the comments pertain to traffic and transport issues, with some relating to open space and vegetation.




#### Project Concerns

**Increased traffic**

C1. Yarra are concerned that daily traffic volumes on the Eastern Freeway could increase *"significantly"* which would result in additional traffic in Yarra, including on local and arterial roads as motorists seek alternate routes. They are concerned about the following specific impacts of increased traffic volumes:

- Congestion on local and arterial roads
- Delays to street-based public transport
- Increases in heavy vehicles
- Worsened cycling conditions

[18] MTIA or Major Transport Infrastructure Authority oversees the Level Crossing Removal Project, Rail Projects Victoria, WGT, NELP and Major Road Projects Victoria.

The *TTIA* presents results of changes in forecast vehicle kilometres travelled on arterial and local roads by municipality. The modelling results show that Yarra is forecast to result in a zero-net change in traffic volumes between 2036 'with project' and 'no project' scenarios[19].

The *EES* notes that traffic on Hoddle Street is predicted to increase by a modest 2 per cent value across the day in the 2036 'with project' scenario compared to the 2036 'no project' scenarios, which falls within the typical day-to-day fluctuations of general traffic.[20]

For reference, Table 5.1 below summarises changes in traffic volumes between the 2036 'no project' and 2036 'with project' scenarios for various roads within Yarra.

**Table 5.1: Daily traffic volumes on streets in City of Yarra[21]**

| Street Segment | 2036 'no project' volume | | 2036 'with project' volume | |
|---|---|---|---|---|
| | Eastbound/ Northbound | Westbound/ Southbound | Eastbound/ Northbound | Westbound/ Southbound |
| Alexandra Parade – Queens Parade to Hoddle Street | 35,000 – 45,000 | 31,000 – 41,000 | 35,000 -45,000 | 32,000 – 42,000 |
| Hoddle Street – Eastern Freeway to Johnston Street | 42,000 – 55,000 | 42,000 – 55,000 | 44,000 – 57,000 | 43,000 – 55,000 |
| Johnston Street – Wellington Street to Hoddle Street | 8,000 – 11,000 | 9,000 – 11,000 | 8,000 – 11,000 | 9,000 – 11,000 |
| Queens Parade – Hoddle Street to Alexandra Parade | 8,000 – 10,000 | 9,000 – 11,000 | 7,000 – 10,000 | 8,000 – 10,000 |
| St Georges Road – Holden Street to Alexandra Parade | 9,000 – 11,000 | 10,000 – 13,000 | 8,000 – 11,000 | 10,000 – 13,000 |
| Victoria Parade – Hoddle Street to Lansdowne Street | 26,000 – 34,000 | 24,000 – 31,000 | 26,000 – 34,000 | 24,000 – 31,000 |

As shown in the Table, traffic volumes are not expected to materially increase on key links in Yarra and in some cases, decrease by a nominal amount.

By way of a safeguard, EPR T5 which requires the contractor to:

[19] (Transport and Traffic Impact Assessment, 2019, p. 323)
[20] (Transport and Traffic Impact Assessment, 2019, p. 291)
[21] (Transport and Traffic Impact Assessment, 2019, pp. D-32 to D-46)

*"Undertake traffic monitoring on selected roads (arterial and non-arterial) identified in consultation with the relevant transportation authorities and local council pre-construction, at six monthly intervals during construction, and up to two years after construction is complete. As part of the selection process, consideration must be given to roads that carry public transport services. Implement local area traffic management works in consultation with the local relevant councils."*

I am satisfied that this provides a suitable framework to intervene if select streets are identified as carrying higher traffic levels than forecast (noting that some interpolation will be required between 2027-2029 transport demands and those forecast for 2036 under the *EES*). Where Yarra have raised specific modal impacts, I have reviewed and present discussion below.

Delays to street-based public transport

As outlined above, traffic increases are expected to be relatively nominal in Yarra across the average day.

Modelling indicates that public transport travel times at the whole-of-route level are expected to remain unchanged or marginally decrease,22 as shown in Table 5.2 for routes that run through Yarra.

**Table 5.2: AM peak inbound travel time change – 2036 'with project' compared to 2036 'no project' (negative change in travel time means quicker journey)[22]**

| Route | Description | Travel time change |
|---|---|---|
| | **Tram routes** | |
| **11** | West Preston – Victoria Harbour Docklands | 0% to -5% |
| **48** | North Balwyn – Victoria Harbour Docklands | 0% to -5% |
| **86** | Bundoora RMIT – Waterfront City Docklands | 0% to -5% |
| **109** | Box Hill – Port Melbourne | 0% to -5% |
| | **Bus routes** | |
| **200** | Bulleen – City (Queen Street) | 0% to -5% |
| **207** | Doncaster SC – City (Queen Street) | 0% to -5% |
| **250** | La Trobe University – City (Queen Street) | -5% to -10% |
| **302** | Box Hill – City (Lonsdale Street) | 0% to -5% |

The *TTIA* notes that a small number of intersection approaches worsen for bus routes in the 'with project' scenario, however these delays are more than offset by decongestion elsewhere on the network as well as specifically assigned routes where a net reduction in bus travel time is estimated.[22]

Further, EPR T1 requires the contractor to: *"Optimise the design of the works in consultation with appropriate road management authorities, public transport authorities, relevant land managers and local councils as part of the detailed design process to: Work with relevant public transport authorities to minimise impacts on buses, trams and rail and, where practicable, enhance public transport facilities and services that cross or run parallel to the alignment of North East Link."*

EPR T1 sets an appropriate benchmark on facilitative works for public transport (noting requirements under the *Public Works Order* with EPR T5 also requiring the contractor to undertake traffic monitoring on selected roads which I expect will be identified through the TMLG. On this basis, I am satisfied these issues are satisfactorily managed under the proposed management framework.

Increase in heavy vehicle traffic

Modelling results[23] show that the Eastern Freeway between Chandler Highway and Hoddle Street (at the boundary of Yarra) is expected to carry an additional 200 trucks inbound (westbound) and 300 trucks outbound (eastbound) on an average weekday in the 2036 'with project' scenario compared to the 2036 'no project' scenario. This represents less than 10% of the 2036 'no project' average weekday truck volumes.[24]

On the other hand, the Project is expected to decrease truck volumes at other gateways, including Hoddle Street (north of the Eastern Freeway) by 200 vehicles inbound (southbound) and 200 vehicles outbound (northbound) and on St Georges Road inbound (southbound) by 100 vehicles, compared to the 'no project' scenario.[23]

Considering this net change in truck movements, the change into the Yarra LGA is minor if not more favourable under the 'with project' scenario.

22 (Transport and Traffic Impact Assessment, 2019, p. 413 to 414)
23 (Transport and Traffic Impact Assessment, 2019, p. 399)
24 (Transport and Traffic Impact Assessment, 2019, p. 270)

**Figure 5.1: Change in average weekday truck volumes (AWDT), 2036 'with project' versus 2036 'no project' – study area south[25]**


Consistent with earlier observations, EPR T5 provides a suitable framework to monitoring demand on select roads.

Cycling conditions

As referenced earlier, the strategic modelling results show that Yarra is forecast to result in a zero-net change in traffic volumes on local and arterial roads between the 2036 'with project' and 'no project' scenarios[26]. Whilst there may be traffic redistribution within Yarra, analysis indicates that there will be a negligible change in traffic volume.

C2. Concerns regarding the impact of increased demand for cycling to and through Yarra, particularly along corridors which connect to NEL pathways. The submission notes that complementary improvements will be required along a number of key cycling routes (which are listed). Yarra also expressed concerns regarding potential increased maintenance costs associated with new off-road shared paths delivered by the Project, or loss of parking to deliver cycling projects. Seeks proposals to remove on-street parking directly improve travel conditions for people travelling by non-motorised transport modes.

On this issue, I have sought guidance from the Public Works Order, the evaluation objective contained within the Scoping Requirements, the Reference Design and the EPRs noting that Section 5.9 of this Evidence Statement sets out a detailed review of specific active travel

[25] (Transport and Traffic Impact Assessment, 2019, p. 399)
[26] (Transport and Traffic Impact Assessment, 2019, p. 323)

projects raised in submissions as potential 'complementary projects' for inclusion as part of the overall Project.

In that section, discussion is provided on a range of guiding tests, developed to assist with determining the appropriateness of including or excluding a specific active travel projects by submitters. This section included projects raised by the City of Yarra.

On the issue of any increased maintenance burden, it would be reasonable to expect that increased active travel infrastructure will, the face of it, increase costs of maintenance. The acceptability of these cost increases is balanced by:

1. Increased active travel connectivity within Yarra and the broader network which is consistent with a range of state and local policies which seek to support sustainable transport practices, and
2. A project which will help facilitate productivity improvements within Yarra and broader Melbourne in support of further population, employment and educational growth for all Victorians.

On my review of the *EES*, there are no obvious changes to the network that appear to result in losses of parking for the Yarra LGA. On the ultimate project being delivered, detailed design would need to be optimised in consultation with Council in accordance with EPR T1.

C3. Seeks further detail on where and how bus travel time improvements will be realised in non-freeway environments (i.e. inner city and eastern suburbs).

Travel time improvements for buses will be realised through the North East Link's ability to attract trips onto the corridor from local and arterial roads.

The *TTIA* notes that travel speeds across the bus and tram network in the north-east are forecast to increase by approximately 3 per cent in the morning and evening peak periods and by 2 per cent across the day. Modelling also shows that whole-of-route travel times for bus services are predicted to decrease by up to 10 per cent, which *"reflects the general decongestion of the north-eastern arterial road network"*.[27]

**Modelling Approach/Extents**

C4. Comment that the modelling has been undertaken to a satisfactory level, however the submission contends that no raw survey data has been provided and no independent check of raw survey data has been undertaken.

The *GTA Peer Review Report* included an independent peer review of microsimulation (operations) modelling. The *GTA Peer Review Report* noted that no raw survey data was provided and GTA recommended that an independent check be undertaken to on the raw survey

[27] (Transport and Traffic Impact Assessment, 2019, p. 412 to 413)

data to confirm the validity and suitability for use. In raising this issue with project technical team (SmedTech), GTA was advised that data has been shared with VicRoads for information and review, with no issues raised.[28,29] SmedTech also advised that they compared the survey day data to that of the full month and found that it was representative of typical traffic volumes.[29]

On the adequacy of strategic modelling relied upon by the Project, this was undertaken by a separate, independent peer reviewer and is outside the scope of this assessment.

C5. Concerns that microsimulation modelling does not include the interchange of Hoddle Street/Eastern Freeway, despite the preceding section of the Eastern Freeway having "the lowest average vehicle speed of all freeways in Melbourne".

The *GTA Peer Review Report* raised a similar question and recommended replicating *"the operational effects associated with the Hoddle Street and Eastern Freeway junction to ensure those characteristic elements are appropriately considered on the operation of the broader corridor".*[30]

The memorandum of information provided to GTA during the preparation of this evidence statement confirms that consideration was given prior to settling the EES technical report to ensuring that any back-queue from Hoddle Street into the Eastern Freeway was reviewed, documented and subsequently relied upon to inform the 2036 'no project' and 'with project' outcomes. That memorandum indicates that back-queuing extends to around 1km during the AM peak. This compares with an offset between Hoddle Street and the Chandler Highway of around 3km.

Further, it is worth noting that the forecast increases in transport demand at this end of the corridor are modest during the road network AM and PM peak periods. This modesty reduces the flow on effect of queues generated at the Hoddle Street node back into the operations model.

Lastly, in raising this matter with SmedTech, we have been advised that the model scope was also discussed and agreed with VicRoads, including the decision not to specifically include the Hoddle Street interchange.[31]

C6. Concerns that an existing year assessment has not been undertaken as the 2026 road network performance will be primarily driven by population and employment growth between 2016 and 2036. Concerns that absence of this assessment means that congestion hotspots are not identified.

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28 (North East Link Microsimulation Model Peer Review, 2018, p. 8)

29 SmedTech memo dated 24/09/18, as cited in (North East Link Microsimulation Model Peer Review, 2018), Appendix C

30 (North East Link Microsimulation Model Peer Review, 2018, p. 8)

31 SmedTech memo dated 24/09/18, as cited in (North East Link Microsimulation Model Peer Review, 2018), Appendix C

The methodology applied to the *EES*, which involves a 10-year post implementation planning horizon, is consistent with my experience.

On identifying hot spots on the network, considerable effort has been exercised on reviewing current network operation in and around the Project corridor. These investigations have influenced coding of the models for both the existing condition and 'with project' and 'no project' outcomes for the 2036 evaluation year.

C7. The City of Yarra raise the following concerns relating to the strategic modelling inputs and assumptions:

- Comment that a spreadsheet model is used to convert 'partially constrained' strategic modelling demand to constrained traffic demand by shifting excess demand to either side of the peak period. Concern that this approach does not capture re-routing on oversaturated routes and that this re-routing will impact the local community.
- Concerns that scenario testing of different growth and transport infrastructure improvements were not undertaken to understand impacts.
- Questions basis of why East West Link was not included in the list of committed transport projects that will be completed by 2036, given it is a high-profile project with Federal budget allocation.
- The submission contends that no review of the forecast modelling has been undertaken.

An expert evidence statement for strategic modelling is being prepared by a separate, independent witness and falls outside of the scope of this review.

## Recommendations & Requests

R2. Seeks for the Project to meet objectives of the Transport Integration Act (2010), particularly those related to 'Environmental Sustainability', 'Integration of Transport and Land Use' and 'Safety and Health and Wellbeing'.

Section 3 of this Evidence Statement outlines an assessment of the Project's alignment with key transport policies, strategies and relevant reference legislation.

**Active travel**

R3. Seeks complementary improvements along a number of Yarra's key cycling routes – Wellington Street, Roseneath Street, South Terrace, Trenerry Crescent, Gipps Street.

Complementary active transport projects are considered at Section 5.9.3.

R4. Seeks all new shared use paths delivered by the Project be a minimum of 3.0m in width, be signed off by Council and be in accordance with Design Guidance for Strategically Important Cycling Corridors and other policies and standards.

I do not consider there to be a need for the EPRs to prescribe a specific guideline or practice. However, this request highlights that the EPRs should be adequately drafted to ensure the Project is designed to a suitable standard.

The EPR related to the design outcomes of the Project is EPR T1 which states:

*Optimise the design of the works in consultation with appropriate road management authorities, public transport authorities, relevant land managers and local councils as part of the detailed design process to:*

- *Minimise adverse impact on travel times for all transport modes, including walking and cycling*
- *Maintain, and where practicable, enhance the existing traffic movements at interchanges*
- ***Design interchanges and intersections to meet relevant road and transport authority requirements***
- *Maintain, and where practicable, enhance pedestrian movements, bicycle connectivity, and shared use paths*
- *Work with relevant public transport authorities to minimise impacts on buses, trams and rail and, where practicable, enhance public transport facilities and services that cross or run parallel to the alignment of North East Link*

The current wording of the EPR only requires interchanges and intersections to be designed to meet relevant road and transport authority requirements. Upon reflection it may be appropriate to consider revisions to the EPR to broaden the requirement of the Project works to meet relevant road and transport authority requirements beyond interchanges and intersection design.

On this change, it would be appropriate to broaden the application of the third bullet point of EPR T1 to read:

- ***Design the Project to meet relevant road and transport authority requirements***

On whether the EPRs should prescribe a specific guideline such as the Institute for Transportation and Development Policy suggested by the submitter. However, I believe it is appropriate for the EPRs to require the Project meet the design requirements of relevant road and transport authorities as applied in the applicable jurisdiction and which are relevant at the time of design. This should sufficiently balance the ability for the Project to encourage innovation whilst ensuring minimum standards are met.

R5. Seeks better opportunities be provided for pedestrians and cyclists to cross major roads connecting with the NEL Project area such as the Eastern Freeway, Alexandra Parade and Hoddle Street.

This complementary active transport project is considered at Section 5.9.3.

R6. Seeks that the ability to extend pedestrian crossing times on Alexandra Parade and Hoddle

Street should not be refused due to additional traffic caused by the Project.

Transport flows will change as a result of this Project. Decisions to alter pedestrian phasing following implementation of the Project would need to be subject to an assessment by DoT and evaluated independently of this Project as the specified locations sit outside the nominated Project corridor area.

**Doncaster busway and integration with the broader network**

R7. Seeks for the Project to not preclude construction of Doncaster rail in the future.

As outlined in Chapter 6 of the *EES*[32], a future Doncaster Rail option would not be precluded by North East Link, as the dimensions of the Doncaster Busway corridor are consistent with those required to accommodate heavy rail in the future. On the deliverability of heavy rail, I have been instructed that the busway would need to be removed and replaced.

R8. Seeks that the intersection of Hoddle Street/Eastern Freeway and other intersections along Hoddle Street and Victoria Parade used by rapid bus services to be modelled to understand impacts.

Please refer to response to C5 and R10.

R9. Seeks a 'bus operational plan' be prepared to complement delivery of the busway and ensure benefits are fully realised. This plan should include detail regarding minimum headway provision, various commitments to enhance quality and comfort (listed), commitment to electrified fleet on the busway route and for the busway to meet 'BRT gold standard' compared to international best practices.

Operational analysis completed in support of the *EES* includes specific consideration of busway infrastructure and headway operating times. Set out elsewhere in this Evidence Statement, the *EES* operations modelling allows for bus frequencies of up to 140 buses per hour (per direction) or just over two buses every minute indicating approximate 30 second headways.

The request for an operational plan is a matter for DoT rather than the Project team given that they (as a department) co-ordinate the overall bus network. I expect DoT will have an ongoing role on this Project in support of preparing a detailed design concept before implementation in accordance with requirements set out under EPR T1. This involvement will determine the standard and detail around the busway provision using the Public Works Order and Project Scoping Requirements as a guide.

R10. The City of Yarra identified there to be a gap in public transport provision along Alexandra Parade needs urgent rectification. They also seek improvements to bus operating environment between CBD and Eastern Freeway, including potential full-time bus lanes or other infrastructure to facilitate bus movement. This may include two high-quality bus

[32] (North East Link Environmental Effects Statement, 2019, pp. 6-8)

corridors on Hoddle Street, Victoria Parade, Johnson Street, Alexandra Parade, Wellington Street, Nicholson Street and Lygon Street. The City of Yarra express concerns that supporting works may require removal of car parking. They request compensation for any removal of paid parking.

As I interpret the reference design and *EES*, public transport services for the most part, are upgraded along the Eastern Freeway to a location immediately east of the Hoddle Street / Alexandra Parade junction and matching in after that with existing infrastructure. On the acceptability of this approach, the Scoping Requirements provide a schematic diagram of the Project outline which on my interpretation indicates that Alexandra Parade sits outside the selected Project outline area.

Noting that the reference design represents one amongst a range of potential solutions for east-west public transport services, opportunities do exist to extend infrastructure further west noting that there is no clear or evident *"gap"* that would be filled by extending these services to the Project outline edge. On this, it is evident that a strategy which involved extending public transport access exclusivity (if that is what is inferred) along Alexandra Parade would require careful consideration of other impacts including:

- The likely impact of the productivity and functioning of Alexandra Parade through the likely required re-allocation of road space,
- Other strategic plans and design solutions which involve a broader strategic remit around east-west travel along Alexandra Parade and beyond,
- Contributions made by DoT on the need to extend public transport services beyond those shown in the *EES* reference design through its role on the TRG.

Lastly, given that the *EES* concept plan reflects a reference design, an opportunity remains to extend public transport services further west through EPR T1, which requires the contractor to:

*Optimise the design of the works in consultation with appropriate road management authorities, public transport authorities, relevant land managers and local councils as part of the detailed design process to: Work with relevant public transport authorities to minimise impacts on buses, trams and rail and, where practicable, enhance public transport facilities and services that cross or run parallel to the alignment of North East Link.*

On improvements between the Eastern Freeway and the CBD, the Hoddle Street streamlining project is currently on foot. This project includes holistic transport upgrades along that corridor as outlined in the exert below which includes changes around the Eastern Freeway and Johnston Street. Areas beyond this section of Hoddle Street extend well outside the Project corridor and therefore outside the area contemplated by the gazetted Public Works Order as well as requirements set out under the Project Scoping Requirements.

On any loss of on-street car parking, a review of the reference design indicates that there is currently no proposal to remove on-street parking within the City of Yarra to deliver the Project. On any detailed design, EPR T1 provides a framework for the minimised loss of car parking in consultation with the relevant local council.

**Figure 5.2: Streamlining Hoddle Street: Project Overview[33]**


R11. Seeks for Council to be consulted regarding route options for Doncaster bus services between the Eastern Freeway and the CBD.

In the event that a meaningful change is proposed to existing routing, this is considered reasonable and is satisfactorily captured by EPR T1. At this stage, the reference design does not propose any meaningful change to routes along these roads.

R12. Seeks proposals to extend the hours or length of Clearways to deliver bus improvements after complying with associated legal procedures and industry agreements.

The Project does not propose to extend the hours or length of Clearways to support upgrades to bus corridors in Yarra. Given the requirement to navigate a range of independent processes which need to be undertaken independent of the Project I would not recommend the Project

[33] (Streamlining Hoddle Street: Project Overview)

include these changes but rather they be pursued separately and independently of current *EES* planning.

R13. Seeks compensation for the Project's removal of any paid parking bays to deliver bus corridor upgrades.

The Project does not propose to upgrade bus corridors or remove paid parking bays to support upgrades to bus corridors in the City of Yarra beyond the extents of the Project (as defined by the Public Works Order and as shown in the reference design). I would expect consultation to occur with the relevant council should the detailed design consider these changes. A request and need for compensation from / to an LGA I would expect would be one amongst a range of issues considered before selecting to adopt this type of change.

R14. Seeks that the Project does not result in additional traffic growth or through traffic on local roads or through key centres and that any growth be offset through funding to improve walking, cycling and public transport.

Growth in traffic at a local level is dealt with by the strategic model relied upon to inform outcomes associated with the Project. Local areas are represented as 'zones' in the network wide model, with estimates subsequently provided for higher order roads on the network including roads which bisect key centres in and around the City of Yarra municipality. The *EES* subsequently assesses the impacts of this traffic growth noting that meaningful levels of transport activity will be attracted to the corridor and off other roads within the City of Yarra when comparing the 2036 'with project' and 'no project' scenarios[34].

Where local roads within the municipality might be potentially adversely affected, EPR T5 provides a sufficient mechanism to allow the City of Yarra to nominate streets of concern and be consulted in relation to the development of local area traffic management works to respond to the findings of traffic monitoring where required.

R15. Seeks implementation of a post construction monitoring framework to quantify changes in traffic flow, including measuring traffic volumes, public transport delay and other impacts. Seeks a funding pool to deliver works to respond to these monitoring outcomes.

EPR T5 requires "*traffic monitoring on selected roads (arterial and non-arterial) identified in consultation with the relevant transportation authorities and local council pre-construction, at six monthly intervals during construction, and up to two years after construction is complete*". The EPR requires that *"consideration must be given to roads that carry public transport services"* and that local area traffic management works are to be implemented in consultation with the local relevant Councils.

[34] (Transport and Traffic Impact Assessment, 2019, p. 323)

On developing a specific framework, I expect the TMLG group will take a leading role in coordinating and managing this requirement, drawing on experiences from other major transport projects currently underway in Melbourne and Victoria.

I expect the Project proponent will have funds allocated for works required to support the treatment or intervention of adverse outcomes associated with the monitoring programme.

R16. Contends that traffic associated with NEL should not be used to support a future business case for East West Link.

Any business case for East-West Link will need to consider implications associated with NEL subject to their being a government commitment and or delivery of the NEL Project (i.e. it proceeding).

## 5.4.2. Manningham City Council (Submission 316)

### Summary

Overall, Council provides in-principle support for the Project, recognising its benefits to the north-east and broader Melbourne. The Council does not however support the Project as presented in the reference design due to its impacts on Manningham and surrounds. The submission covers a broad range of themes and disciplines, including traffic and transport issues.

These issues are summarised below, along with my responses to assist the IAC.


### Project Concerns

**Evaluation of Risk**

C8. Concerns that the risk ratings adopted for the Project are overly optimistic and underestimate the likelihood of an event, underestimate the consequences of an event and overestimate the efficacy of mitigation strategies. Concerns that data gaps make it difficult to make credibly evaluate risk.

The *GTA Peer Review Report* provided commentary on the risk evaluation process outlined in the *TTIA*. The *GTA Peer Review Report* "*does not explore the accuracy or appropriateness of the identified potential threats and/or effect on the environment*" but found that "*the process and methodology set out in the risk assessment appears consistent with peer review expectations*