

16 December 2021

By Email

Kathy Mitchell  
Chair of the SRL East IAC

Dear Ms Mitchell,

**SRL East Project IAC - Key dates and directions**

We act for the Suburban Rail Loop Authority (SRLA), the proponent of the SRL East Project (**Project**).

We refer to the Key Dates and Directions dated 17 November 2021 issued by the IAC, and are instructed to advise that our client intends to be represented at the IAC hearing and to lead evidence and provide other materials to assist the IAC respond to its terms of reference.

The purpose of this letter is to suggest an alteration to the proposed timetable to defer the filing of any party's evidence on traffic and transport matters pending information exchanges and discussions between transport agencies, along the lines summarised below.

Based on our client's engagement with transport agencies and the project advocacy documents published by local governments, it is expected that some transport agencies' EES submissions will contend for "feasible modifications" to the project design or to the layout of transport links and connections in the vicinity of the stations comprising the Project. The consideration of any such submissions will require specialist analysis and would be assisted by discussions between our client and the relevant agencies. It is also understood that further information may be sought by road agency submitters in respect of aspects of the Transport and Traffic Impact Assessment which forms part of the EES (TTIA).

One option to address these matters would be to call and cross-examine the transport expert witnesses called by the various submitters in the usual way. In this case, however, our client proposes an interim step in which it would convene information sessions with the Department of Transport, the affected local councils, and any other transport agency submitter. The purpose of the sessions would be to allow our client to respond to any queries that the transport agencies and local government authorities have raised in their EES submissions concerning the TTIA, and to provide initial feedback on the traffic- and transport-related implications of any alternative layouts proposed by relevant authorities. It is anticipated that any items of agreement could be recorded and tabled before the IAC so as to narrow any issues in dispute. Even if the sessions do not result in agreement being reached on particular issues, our client sees

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value in the agencies and councils exchanging information and being fully aware of their respective positions on transport-related matters in advance of the hearing.

If this suggestion is accepted by the IAC, our client proposes to schedule sessions in the week commencing 7 February 2021 and issue invitations to relevant agencies and municipal councils accordingly. This timing suits the Christmas break and allows sufficient time for our client to review relevant EES submissions. We suggest that the sessions be open to officers and transport advisers of the agencies and councils, and that they be relatively informal. Whilst it is not proposed that expert witnesses be required to attend the sessions, ideally they would have the benefit of any outcomes of the sessions before the filing of expert witness statements.

Accordingly, we are instructed to suggest that the date for filing of expert evidence on this topic be deferred by two weeks. If the IAC sees merit in this approach, we recommends that directions be issued altering the *Key Dates and Directions* as relevant to evidence regarding traffic and transport issues only to the following effect:

- All SRLA expert evidence concerning traffic and transport is required to be filed on Monday, 28 February 2021;
- All other parties expert evidence concerning traffic and transport to be filed on Thursday, 3 March 2021;
- Any SRLA reply evidence to be filed on Tuesday 8 March 2021.

To accommodate the later exchange of this material, we would not call expert evidence relating to traffic or transport issues before the week commencing 14 March 2021.

Our client's proposal to conduct transport information sessions of this type is directed towards promoting coordination and cooperation between statutory road and transport authorities and in the interests of enhancing timetable efficiency.

Yours sincerely,



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Partner

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