# **EXECUTIVE SUMMARY**







# S1 INTRODUCTION

VicRoads has prepared this Planning Assessment Report (PAR) as part of the planning process to determine the route and the required environmental mitigation measures for the Outer Metropolitan Ring / E6 (OMR/E6) Transport Corridor, between the Princes Freeway, west of Werribee and the Metropolitan Ring Road at Thomastown, together with a route for a possible future link freeway between the Western Freeway (Deer Park Bypass) and the Outer Metropolitan Ring Transport Corridor at Mount Cottrell.

The proposal for the OMR/E6 Transport Corridor is a key long term planning initiative in the Victorian Transport Plan. The OMR/E6 Transport Corridor is being planned in an integrated manner with the planning for changes to Melbourne's Urban Growth Boundary, the Regional Rail Link and protection of rare and endangered grasslands. It is important that this planning be integrated because of the fundamental interrelationships between the projects. Consequently, they are being displayed for public comment simultaneously.

This Executive Summary summarises the PAR prepared by VicRoads.

VicRoads has worked with an Interdepartmental Taskforce and a Technical Reference Group of Government agencies and Council officers. The content of this PAR is based on the information compiled by VicRoads and specialist consultants.

# S2 BACKGROUND

Significant population growth is projected for Melbourne and regional areas surrounding Melbourne in the period leading up to, and beyond 2030. Much of this population growth is projected to occur in Melbourne's northern and western areas because land remaining for further development in Melbourne's south east is limited.

In December 2008, *Melbourne @ 5 million* announced a number of "Investigation Areas" for potential inclusion within Melbourne's Urban Growth Boundary, including areas of land within the municipalities of Wyndham, Melton, Hume, Mitchell and Whittlesea. Also in December 2008, the Victorian Transport Plan (VTP) announced an investigation of the Outer Metropolitan Ring Transport Corridor. The VTP indicated that while planning needed to be undertaken, it was unlikely that funding would be available for construction before 2020.

# S3 PURPOSE OF PLANNING ASSESSMENT REPORT

The purpose of this Planning Assessment Report is to provide information about:

- > The strategic setting for the proposed Transport Corridor;
- > The project assessment framework;
- > The route options which have been developed for the alignment ;
- > The assessment and quantification of the potential benefits and adverse impacts of the route options;
- > VicRoads recommended route option; and
- > Measures to avoid or mitigate adverse impacts of the route options on the environment.

Copies of reports by specialist consultants are provided in a separate Technical Supplement.

### S4 PROJECT OBJECTIVES

The OMR/E6 Transport Corridor is being planned to provide an ultimate high speed transport link for freight and people that would:

- Enhance connectivity between key international transport hubs such as Melbourne Airport, Avalon Airport and Port of Geelong;
- > Improve access to the proposed Donnybrook/Beveridge Interstate Rail Terminal;
- > Serve as an important route to interstate and major regional destinations;
- Link residential and employment growth areas in the north and west of Melbourne; and
- > Improve access in this major employment corridor which includes Avalon Airport, Werribee, Melton, Melbourne Airport and Donnybrook

As with all infrastructure projects other key objectives based on compliance with government legislation or good planning practice are to:

- > Ensure that the project is capable of performing its function of providing safe and efficient movement;
- > Ensure that the project is technically feasible ;
- Avoid as far as possible, minimise where unavoidable and provide offsets for any biodiversity impacts;
- > Avoid as far as possible, minimise where unavoidable and prepare a Cultural Heritage Management Plan to mitigate any Cultural Heritage impacts; and
- > Minimise socio-economic impacts in relation to existing and future residential and industrial development and maximise opportunities for future urban development.

#### S5 STAKEHOLDER AND COMMUNITY CONSULTATION

A Technical Reference Group (TRG), comprising Government agency and Council officer representatives, was established to provide advice to VicRoads about technical issues and community consultation. Individual agencies and Councils were consulted as required. An Interdepartmental Taskforce was subsequently established to coordinate planning for a proposed new Urban Growth Boundary, the proposed OMR/ E6 Transport Corridor, the proposed Regional Rail Link and the proposed western grassland reserves.

The public display of the recommended route will be held until 17 July 2009 and public submissions are invited on the proposal displayed.

# S6 RECOMMENDED ROUTE

#### S 6.1 BROAD ULTIMATE CONCEPT

The OMR/E6 Transport Corridor between west of Werribee and Kalkallo is being planned to allow for a freeway standard road, capable of being upgraded ultimately to four lanes in each direction (with appropriate auxiliary lanes), together with four railway tracks in the median for interstate freight and high speed passenger trains. The proposal would enable the ultimate road development to include freeway to freeway and freeway to arterial road access points, via grade separated interchanges.

Alternative access arrangements would be provided for roads severed by the proposed corridor.

The proposal includes provision for connections from the railway corridor in the median of the OMR to existing railways, west of Werribee (west to north), near Rockbank (south to east) and in the vicinity of Beveridge (west to north).Between Kalkallo and Epping, the E6 transport corridor would provide now for the eventual construction of a freeway standard road with three lanes in each direction. This new corridor would link to the existing E6 reservation at Findon Road, Epping, which would enable a six lane freeway standard road to connect southward to the M80 (Metropolitan Ring Road) at Thomastown (between Dalton Road and Plenty Road).

The Deer Park Bypass / OMR/E6 Transport Corridor connector would ultimately provide for a freeway standard road of three lanes in each direction.

Adjacent properties would not be able to gain access to the OMR/E6 Transport Corridor, other than for approved emergency purposes. Access restoration roads would be provided to restore access to land severed from road access by the proposed corridor in most cases. In some cases, it may be more appropriate to combine land titles.

The proposal would include treatments to provide replacement or better managed habitat to replace the vegetation cleared as part of the construction process, within the framework provided by an overall approach to habitat management associated with the revision of Melbourne's Urban Growth Boundary.

VicRoads would ensure that noise reduction measures are provided in line with its noise policies and undertake measures to protect the water quality of rivers and creeks. The proposal would also incorporate extensive landscaping measures.

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#### S6.2 ROUTE DESCRIPTION

The recommended route of the proposed OMR/E6 Transport Corridor is shown at Figure S1.

The proposed OMR/E6 Transport Corridor would commence at the Princes Freeway, west of Werribee. It would head north to pass west of the existing residential area of Wyndham Vale, and then head north-east towards Tarneit. At around Boundary Road, Mount Cottrell, the corridor would then swing north, run just to the east of Troups Road South, and cross the Western Freeway, east of Troups Road North, Rockbank. It would then shift slightly east to head north, just to the west of Plumpton Road. North of the Melton Highway (Keilor-Melton Road), the corridor would swing north-east to cross the Calder Freeway between Calder Park and Diggers Rest. It would then cross Jacksons and Deep Creeks and pass to the north of Bulla and west of Craigieburn. North of Donnybrook Road, Mickleham, the corridor would swing east to cross the Hume Highway between Kalkallo and Beveridge, in the vicinity of Donovans Lane. The corridor would cross the Melbourne-Sydney railway and then swing south east before heading broadly south parallel to Epping Road and then Bindts Road to meet the existing E6 reservation at Findon Road. The corridor would then follow the existing public acquisition overlay reservation to the Metropolitan Ring Road at Thomastown.

Additionally, the proposal includes provision for an east-west link between the Western Freeway, Deer Park Bypass and the OMR/E6 Transport Corridor, broadly following a line just south of Middle Road, Truganina. VicRoads has also defined a study area for a possible high standard connection between the OMR/E6 Transport Corridor and Melbourne Airport, with potential for this connection to pass either to the east or west of Bulla. Investigations for this corridor will be undertaken in the future.

The proposal also includes provision for a new interchange and access to serve Little River. This is required due to the need to close the existing easterly-oriented ramps on the Princes Freeway interchange at Little River Road, as a result of its close proximity to the proposed interchange with the OMR/E6 Transport Corridor.

#### S7 EVALUATION OF ROUTE OPTIONS

The recommended proposal was evaluated against the assessment objectives outlined in S4. The proposal complies with current VicRoads and Department of Transport design standards. Preliminary geotechnical evaluation does not indicate any technical problems, so the recommended proposal would not be precluded by engineering considerations.

Table S1 provides a summary of the evaluation. The detailed assessment is presented in Appendix B.

#### TABLE S1: OVERALL CORRIDOR ASSESSMENT

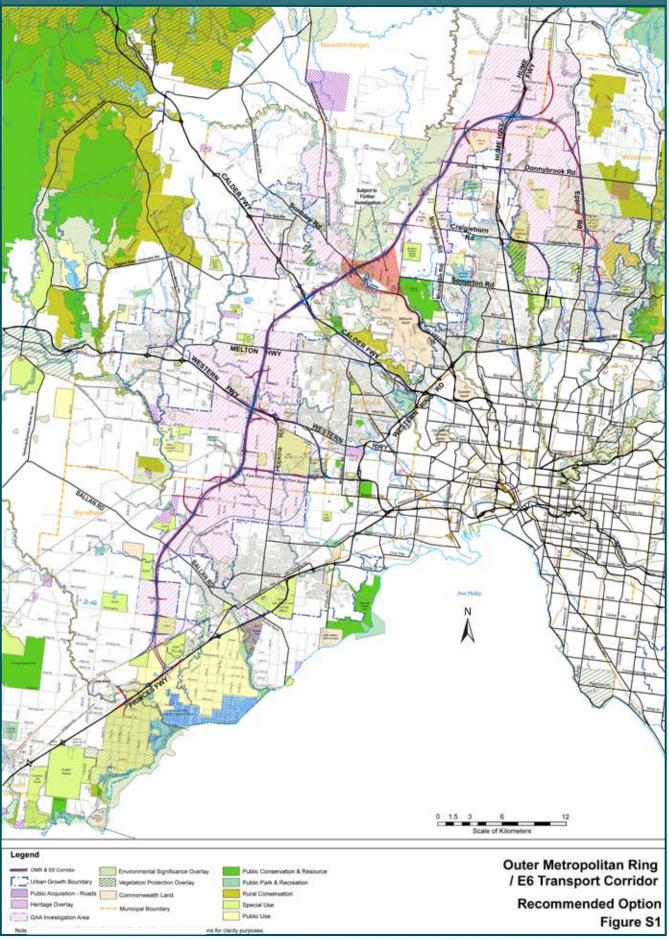
Objective / Sub-objective	Recommended Corridor	Rating
Objective 1: Serves Key international transport hubs, eg Melbourne and Avalon Airports, Port of Geelong, other Intermodal freight hubs and freight service economy areas	<ol> <li>Direct route between airports and for Geelong, Ballarat, Bendigo bound airport traffic.</li> <li>Would save: [compared with existing freeway network]:</li> <li>12.5 km for Wallan-Geelong journey</li> <li>13 km for Wallan-Melbourne Airport journey</li> <li>16.5 km for Gisborne-Avalon journey</li> <li>8 km for Gisborne-Melbourne Airport journey</li> <li>2. Close to potential north Werribee/ west Melbourne freight and service economy areas.</li> <li>3. Serves Donnybrook Beveridge Interstate Rail terminal</li> </ol>	
Objective 2: Serves key interstate and major regional destinations	Would meet this objective - good links to Princes, Western, Calder and Hume Freeways. Geelong- Melbourne Railway , Ballarat - Melbourne Railway and Melbourne - Sydney Railway lines.	
Objective 3: Provides better links to residential and employment growth areas to the north and west of Melbourne, eg Werribee, Melton and Mickleham		
Objective 4: The Project is capable of performing its function	Would provide Outer ring function for road and high speed rail for interregional/interstate passenger and freight.	Very well
Objective 5: The project is technically feasible		
Technically feasible	Yes - feasible. Optimal Crossing of Jacksons and Deep Creeks, Optimal near Mickleham Rd as following ridge line of Deep Ck.	Satisfacto
Fechnically feasible interchanges	Western Freeway interchange would requires relocation of Western Freeway slightly to the north near Rockbank.	Satisfacto
Technically feasible rail connections	Feasible but would require lowering of Bendigo - Melbourne Railway Line (outcome of more detailed design).	Satisfacto
Terrain constraints	<ol> <li>Limited options for Werribee River crossing.</li> <li>Need to avoid Mt Atkinson.</li> <li>Optimal for Jacksons and Deep Creek crossings.</li> <li>Follows ridge line of Deep Creek at Mickleham Rd.</li> <li>Slightly into foothills north of Donnybrook Road</li> </ol>	Very wel
Dbjective 6: Avoid as far as possible, minimise wh	ere unavoidable and provide offsets for any Biodiversity impacts to achieve net gain	
Southern Section OMR - Princes Freeway at Werribee to Werribee River	Flora - 1 EPBC listed species has been recorded - Large-headed Fireweed (vulnerable). 1 FFG listed species has been recorded - Large-headed Fireweed (threatened). Main EVC impacted is Plains Grassland (endangered). 3 EPBC listed species have the potential to occur within the OMR Right of Way (ROW). 4 FFG listed species have the potential to occur within the OMR Right of way (ROW) to occur within the OMR ROW. 2 FFG listed ecological community has the potential to occur within the OMR ROW. 2 FFG listed ecological communities have the potential to occur within the OMR ROW.	Satisfacto
	Fauna - 1 EPBC listed species has been recorded - Golden Sun Moth (critically endangered). 1 FFG listed species has been recorded - Golden Sun Moth (threatened). 14 EPBC listed species have the potential to occur within the proposed OMR ROW. 14 FFG listed species have the potential to occur within the OMR ROW.	Satisfacto
Central Section OMR - Werribee River to Calder Freeway	Flora - No EPBC listed species have been recorded. 1 FFG listed species has been recorded - Buloke (threatened). Main EVC impacted is Plains Grassland (endangered). 3 EPBC listed species have the potential to occur within the OMR ROW. 4 FFG listed species have the potential to occur within the OMR ROW. 1 EPBC listed ecological community has the potential to occur within the OMR ROW. 2 FFG listed ecological communities have the potential to occur within the OMR ROW.	
	Fauna - No EPBC listed species have been recorded. No FFG listed species have been recorded. 14 EPBC listed species have the potential to occur within the proposed OMR ROW. 14 FFG listed species have the potential to occur within the OMR ROW.	Satisfacto
Northern Section OMR - Calder Freeway to Melbourne-Sydney rail line at Kakallo	Flora - No EPBC listed species have been recorded. No FFG listed species have been recorded. Main EVC impacted is Plains Grassy Woodland (endangered). 4 EPBC listed species have the potential to occur within the proposed OMR ROW. 4 FFG listed species have the potential to occur within the OMR ROW. 1 EPBC listed ecological community has the potential to occur within the OMR ROW. 2 FFG listed ecological communities have the potential to occur within the OMR ROW.	
	Fauna - No EPBC listed species have been recorded. No FFG listed species have been recorded. 14 EPBC listed species have the potential to occur within the proposed OMR ROW. 14 FFG listed species have the potential to occur within the OMR ROW.	Satisfacto
Northern Section E6 - Melbourne-Sydney rail line at Kakallo to Findon Rd	Flora - No EPBC listed species have been recorded. No FFG listed species have been recorded. Main EVC impacted is Plains Grassy Woodland (endangered). 4 EPBC listed species have the potential to occur within the proposed E6 ROW. 4 FFG listed species have the potential to occur within the potential to occur within the E6 ROW. 2 FFG listed ecological communities have the potential to occur within the E6 ROW.	Satisfacto
	Fauna - No EPBC listed species have been recorded. No FFG listed species have been recorded. 10 EPBC listed species have the potential to occur within the proposed E6 ROW. 11 FFG listed species have the potential to occur within the E6 ROW.	Satisfacto
Southern Section E6 - Findon Rd to Metropolitan Ring Rd (existing PAO)	Flora - No EPBC listed species have been recorded. No FFG listed species have been recorded. Main EVC impacted is Plains Grassy Woodland lendangered). 4 EPBC listed species have the potential to occur within the existing PAO. 4 FFG listed species have the potential to occur within the existing PAO. 1 EPBC listed ecological community has the potential to occur within the E6 ROW. 2 FFG listed ecological communities have the potential to occur within the E6 ROW.	
	Fauna - No EPBC listed species have been recorded. No FFG listed species have been recorded. 10 EPBC listed species have the potential to occur within the existing PAO. 11 FFG listed species have the potential to occur within the existing PAO.	Satisfacto
To protect catchment values including surface water quality, stream flow, aquatic health and	Mitigation measures would enable acceptable performance	Satisfacto

#### TABLE S1: OVERALL CORRIDOR ASSESSMENT

Objective / Sub-objective	Recommended Corridor	Rating
Objective 7: Avoid as far as possible, minimise wh	ere unavoidable and prepare a Cultural Heritage Management Plan to mitigate any Cultural Heritage Impacts	
Southern Section OMR - Princes Freeway at Werribee to Werribee River	Non - Indigenous cultural heritage - No sites impacted	
	Indigenous cultural heritage - Impact 7 Known sites: 6 artefact scatter sites and 2 earth feature sites. Note one site contained an artefact scatter and earth feature. Land within 200m of river and major creek valleys are of high archaeological potential to contain Indigenous cultural heritage sites.	
Central Section OMR - Werribee River to Calder Freeway	Non - Indigenous cultural heritage - Impact 8 sites. 1 Heritage Register site Rockbank Inn (H1933) near Beattys Rd. 3 Heritage Inventory sites - Rockbank Ridge (H7822-0258) near Beattys Rd Rockbank, Gidney Dam (H7822-0297) and Gidney Farm (H7822-0300) near the Western Fwy at Rockbank. 5 Heritage Overlay sites - Oakbank (H0233) Bulla- Diggers Rest Rd Diggers Rest, Rockbank Inn (H010), Kerr Farm Site (H0110) Boundary Rd Mt Cottrell, 'Rocklands' Homestead & Farm (H0114) Hopkins Rd Truganina and a house (H0120) on the Western Hwy near Rockbank. Note Rockbank Inn is listed on both the Heritage Register and Heritage Overlay. Rockbank Inn is of State significance. All other sites are of local significance.	
	Indigenous cultural heritage - Impact 11 Known sites. All sites are artefact scatter sites. Land within 200m of river and major creek valleys are of high archaeological potential to contain Indigenous cultural heritage sites.	Poorly
Northern Section OMR - Calder Freeway to Melbourne-Sydney rail line at Kakallo	Non - Indigenous cultural heritage- Impact 6 sites. 3 Heritage Inventory sites - Donnybrook Station Site (H7822-0728) near the Melbourne-Sydney rail line at Kakallo and two Donnybrook Quarry Dry Stone Wall sites (H7822-017 & H7822-0198) are near the Melbourne-Sydney rail line at Kakallo. 3 Heritage Overlay sites - Tulloch Outbuilding (H0261) Farleigh Crt Mickleham, Warlaby (H0273) Oaklands Rd Oaklands Junction and Duncan's Lane Bridge (H030) over tributary Jacksons Creek Diggers Rest. All sites are of local significance	
	Indigenous cultural heritage - Impact 10 Known sites: 9 artefact scatter sites and 1 scarred tree. Land within 200m of river and major creek valleys are of high archaeological potential to contain Indigenous cultural heritage sites.	Poorly
Northern Section E6 - Melbourne-Sydney rail line at Kakallo to Findon Rd	Non - Indigenous cultural heritage - Impact 10 sites. 8 Heritage Inventory sites - Donnybrook Station Site (H7822-0728) near the Melbourne-Sydney rail line at Kakallo, Epping Rd Bridge (H7822-0205) on Epping Rd Wollert, two bluestone and granite foundation sites (H7922-0233 & H7922-0234) at Gordons Rd Epping, Hehr's Pine Park Farm (H7922-0297) Epping Rd Wollert and three houses (H7922-0304, H7922-305 & H7922-0460) on Harvest Home Rd. 3 Heritage Overlay sites - Hehrs Pine Park Farm (H010) Epping Rd Wollert, Schultz Farm (H041) Lehmanns Rd Wollert and one bluestone house (H078) located in Harvest Home Rd. All sites are of local significance. Note Hehrs Pine Park Farm is listed on both the Heritage Inventory and Heritage Overlay.	
	Indigenous cultural heritage - Impact 8 Known sites: 7 artefact scatter sites and 1 earth feature site. Creek corridors have been identified as high sensitivity to contain Indigenous cultural heritages sites.	Poorly
Southern Section E6 - Findon Rd to Metropolitan Ring Rd (existing PAO)	Non - Indigenous cultural heritage - No sites impacted	Satisfactory
	Indigenous cultural heritage - Impact 1 Known artefact scatter site. Creek corridors have been identified as high sensitivity to contain Indigenous cultural heritages sites.	Poorly
Objective 8: Minimise socio-economic impacts in I	' elation to existing and future residential and industrial development and maximise opportunities for future urban devel	opment
To have minimal impact on employment centres, major quarry resources and agricultural / rurally based enterprises	<ol> <li>No impact major employment centres, although individual commercial enterprises will be affected.</li> <li>Would impact 5 current and future quarry sites - Boral Wollert; Hanson Wollert; Hanson Future Wollert; Bulla Quarries north of Sunbury Road; Future quarry site south of Sunbury Road.</li> <li>Would impact 602 properties (488 on OMR; 114 on E6), many of which would be agricultural/rurally based enterprises including a vineyard.</li> </ol>	Satisfactory
Industrial development. Other uses , utilities, service centres, intermodal sites	<ol> <li>Nould impact on 2 service centres in vicinity of Rockbank (1 under construction); a third centre is in planning.</li> <li>Any impacts on transmission lines, high pressure gas pipeline, and other utilities would be resolved with the appropriate companies/authorities prior to construction.</li> <li>Emergency service access and would also be resolved and replacement infrastructure provided where required.</li> </ol>	
To protect residents' amenity and well-being, and minimise any dislocation of residents, to the extent practicable	1.Would impact 152 houses/businesses (96 on OMR; 56 on E6) 2. Would impact Chartwell/Tarneit rural residential area; rural residential development along Troups Road North and South; Mickleham Road rural residential area; residences along Epping Road and around Epping Rd/Bridge Inn Rd intersection.	Poorly
To protect the character of significant landscapes, open space and recreation values, to the extent practicable	All significant landscapes protected by an overlay avoided. Would impact Tuttle Reserve, Epping Road.	Satisfactory
Air Quality - to have no exceedances of the SEPP intervention levels for all pollutants	Acceptable (with suitable mitigation)	
Maximise opportunities for future employment development	Would maximise area for development in the Melbourne @ 5 million Investigation Area north and west of Werribee and would allow flexibility for development between Melton and Caroline Springs in the Investigation Area west of Melton and also in the north in the Investigation Area in Hume/ Whittlesea.	
Maximise opportunities for future residential development	Would maximise area for development in north and west of the Werribee Investigation Area and would allow flexibility for development between Melton and Caroline Springs in the Melton Investigation area	
Noise - increase in noise after construction of noise barriers	Acceptable (with suitable mitigation)	
OVERALL OPTION ASSESSMENT	This corridor would have a very strong performance in achieving transport and land use objectives for future development. As this is a long term project, the poor performance of the preferred corridor in relation to impacts on existing residences was considered to be outweighed by the benefits of this option in relation to future land use development. In addition, the precautionary principle has been adopted in relation to Aboriginal cultural heritage as there is high potential for more sites to be discovered, particuarly in relation to river crossings. These two factors plus the satisfactory rating for Environmental Impacts (assessment with proposed mitigation), Post settlement heritage impacts and technical feasibility were considered to reduce the clear benefits in relation to the principal objectives of the project 1-4 above and maximising opportunities for future residential and industrial benefits, giving the preferred corridor an overall assessment of Well.	Well

Note: The precautionary principle has been adopted in relation to the assessment of Aboriginal cultural heritage. All assessments in this table have been rated "Poorly" as detailed studies are yet to be carried out.

#### FIGURE S1: OUTER METROPOLITAN RING ROAD/E6 TRANSPORT CORRIDOR



NOTE: PLANNING SCHEME OVERLAYS DATA JUNE 08 SIMPLIFIED OVERLAY DESCRIPTIONS FOR CLARITY PURPOSES

### S8 KEY BENEFITS OF THE PROPOSAL

The proposal, when constructed, would provide substantial economic and social benefits to the region and the state, by reducing travel times and travel distances for important journeys. The following table summarises key travel distance and travel time savings for selected journeys compared with travel over the existing freeway network.

Journey	Travel Distance Savings (km)	Estimated Travel Time Savings (min.)
Wallan to Avalon	12.5	8
Wallan to Melbourne Airport	13	11
Gisborne to Avalon	16.5	17
Gisborne to Melbourne Airport	8	8

#### S9 NEXT STEPS

The public display of this PAR provides the opportunity for the community and other stakeholders to provide comment on the proposed alignment and on the measures to protect the environment, before a decision is made by the Government.

In addition to this Planning Assessment Report, a referral has been made to the Minister for Planning on the need for an Environment Effects Statement for the OMR/E6.

Following public comment of a draft Impact Assessment, the Department of Sustainability and Environment will forward an Impact Assessment on the program covering revision of the Urban Growth Boundary, the OMR/E6 and the Regional Rail Link to the Australian Government Minister for the Environment, Heritage and the Arts in accordance with the requirements of the Environment Protection and Biodiversity Conservation Act 1999.

After the Government has made a decision on the alignment, it is expected that a Public Acquisition Overlay will be put into the relevant planning schemes to enable VicRoads to acquire the land in the future.

# S10 MANAGEMENT MEASURES

A detailed Project Environmental Protection Strategy (PEPS) (or equivalent) will be prepared in consultation with relevant Government Authorities and interest groups before construction occurs. The purpose of the PEPS will be to minimise preconstruction, construction and post construction impacts on the physical, biological, cultural and social elements of the environment. The PEPS will be designed to provide overall ongoing and day-to-day environmental strategies and actions. It will also provide the framework, objectives, policy commitments and strategies for priority management actions, and will include a clear statement of resources, responsibilities and guidelines for monitoring and auditing.

VicRoads' preferred approach to environmental management is to proactively control and minimise potential environmental impacts through appropriate design and construction techniques, rather than to reactively manage them. Monitoring programs will be established to ensure that the site environment management plan is effectively implemented and potentially adverse impacts are managed. Appendix C outlines the management measures that would be included in the PEPS.

### YOUR VIEWS ARE IMPORTANT

Making an electronic or written submission is the way to let VicRoads and the Government know your views.

Everyone with a view on the proposal is encouraged to make a submission. It is your democratic right to have your views considered.

The following suggestions may help you to prepare your submission:

> Identify the project;

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- > Include your name and address;
- > If relevant, identify any special interest in the project you may have;
- Indicate whether you like or dislike any aspect of the project and explain your reasons;
- > Suggest any changes that you believe would improve the proposal;
- If you own property that is directly affected by the proposal, let us know whether you believe there are modifications to the proposal that could, in any way, minimise the impact of the proposal on your property;
- > Tell us if you believe there are any important topics or issues that have not been addressed;
- > Indicate whether the views expressed in the PAR agree with your knowledge of the area; and
- > Outline any additional safeguards you would like adopted.

Your submission may be brief and informal, or as detailed as you wish. Submissions will add to the body of information on the proposal to enable more informed and better decisions to be made.