

Jonathan Kerr
A/Senior Planning Officer
Transport Assessments, Department of Planning and Environment

Dear Jonathan Kerr,

Re: M7 Motorway (Mod 6 Widening) (SSI-663-Mod-6) (Blacktown)

Council appreciates the opportunity to comment on the proposed M7 Motorway Widening between 140m south of Kurrajong Road, Prestons and Richmond Road interchange, Oakhurst/Glendenning, excluding the section at the Light horse Interchange (**the project**).

Council notes that the road widening is proposed to be carried out within the existing central median island to address congestion along sections of the Motorway and accommodate future travel demand expected from additional developments such as the Western Sydney Aerotropolis. Council supports the project subject to the comments in this letter being incorporated into the project.

The Motorway widening is expected to attract additional traffic flow, increase traffic on a number of intersecting roads/interchanges, and road traffic noise on adjoining residential areas. Council notes that concept and detailed designs have not been carried out and requests that at these design stages, appropriate road capacity improvements as outlined in the Attachment, are to be identified to be implemented.

In addition, road noise assessment be carried out to identify locations where additional noise mitigation measures including noise walls are to be installed. The critical sections to be investigated for noise attenuation works including the above mentioned suburbs.

Middleton Grange is west of the Motorway and has an existing at-grade cycleway along the Motorway. Council is proposing to construct a second access road as an extension of Middleton Drive to Aviation Road. Transport for NSW (TfNSW) has requested that for the road extension, the existing at-grade cycleway is to be grade separated.

Council request that the scope of the project be increased to include grade separation of the at-grade cycleway. Council has completed the strategic concept design for the Middleton Drive Extension including for the associated grade separated cycleway and can provide the design to be incorporated into the project design and delivery. Council notes that Middleton Drive is a local road and would enter into an agreement with TfNSW and the Westlink M7 to clarify its liability and responsibility.

Council requests that no additional toll charges above "standard adjustments" or toll periods to justify the construction of additional lanes be levied on the M7 Motorway.

Council provides the attached additional comments on the expected impacts of the project including traffic and transport impacts, environmental impacts including a need for construction environmental management plan. Should you require any further information please contact us again.

Yours sincerely



Charles Wiafe
Manager Transport Management

Comments on the M7 widening

1. Traffic and Transport Impacts

Council notes that traffic and transport impact assessment report on the project has modelled a number of scenarios with and without the project in order to quantify its impact on the surrounding road network.

The project will significantly improve segment performances along the M7 Motorway from an unacceptable LoS (i.e., E or F) to acceptable LoS (i.e., above D) and reduce travel time along the M7 widening sections. However, the project modelling results (Section 7.1.5 of Appendix D - Traffic and Transport Assessment report) show that a number of intersections on the surrounding road network will operate at an unsatisfactory LoS by 2026 and 2036, including:

- Bernera Road/Yarrowa Street/M7 exit ramp/M7 entry ramp;
- Cowpasture Road/M7 exit ramp/M7 entry ramp; and
- Camden Valley Way/M7/M5 northbound entry ramp/M31 exit ramp.

The unsatisfactory LoS of these intersections will have significant impacts on the M7 motorway operation and the surrounding road network. The widening would bring forward the need to consider improvements to these intersections. Hence, TfNSW and the Westlink M7 are required to identify mitigation measures at these locations in consultation with Liverpool City Council.

The project will result in an unacceptable LoS F by 2036 at the Cowpasture Road/M7 exit ramp/M7 entry ramp intersection. Council has developed a project to extend Middleton Grange Drive under the M7 Motorway to connect to Aviation Road. The project has received in principle approvals from TfNSW and Westlink M7. The proposed extension will provide an essential bus link that will service to the Parkbridge estate in the northern part of Middleton Grange as well as reduce travel demands along Cowpasture Road.

It will also provide an alternative access road between Elizabeth Hills and Middleton Grange. This access road is expected to reduce traffic flow along the section of Cowpasture Road between Qantas Blvd and Airfield Drive to/from Middleton Grange and Elizabeth Hills by approximately 10-20% and will improve the M7 ramps/Cowpasture Road intersection operation to an acceptable level. It will provide mitigation measures to impacts of additional traffic at the M7 Motorway and Cowpasture Road interchange caused by this modification.

The M7 Motorway currently has an at-grade cycleway across the section where Council is proposing to extend the Middleton Drive. TfNSW has requested that for the road extension, the existing at-grade cycleway is to be grade separated.

In addition, the project will result in a permanent closure of on-road cycle facility along the M7 between the M5 Motorway and Richard Road and increase cyclist demands along the existing shared path.

Council requests that the project is to improve the existing shared path along the M7 Motorway, such as grade-separated shared path at Middleton Grange and Ash Road to address some flooding and drainage impacts on the existing shared path route along the M7. A pedestrian and cyclist audit is to be carried out along the existing M7 shared path to address any safety and access issues such as lighting and intersection crossings. Hence, the project is to include the proposed Middleton Drive extension and the grade-separated cycleway.

Council has completed the strategic concept design for the Middleton Drive Extension including for

the associated grade separated cycleway and can provide the design to be incorporated into the project design and delivery. Council notes that Middleton Drive is a local road and would enter into an agreement with TfNSW and the Westlink M7 to clarify its liability and responsibility.

Details of the proposed cycling restrictions on the M7 Motorway mainline between the M5 Motorway and Richard Road are to be submitted to the relevant councils and Bike User groups for comments.

Recommendations

- a) Detailed design investigations are to be carried out to develop improvement solutions on sections of Bernera Road and Cowpasture Road close to the Motorway as part of the concept/detailed design for the project.

The Bernera Road upgrade is to include a connection and crossings under the M7 Motorway and intersection upgrades at the intersection of Bernera Road/ Yarrowa Street/the M7 ramps.

Consultation is required with Council for development of the proposed improvement solutions on Bernera Road and Cowpasture Road.

- b) The project scope of work is to be increased to include Council's proposed Middleton Drive extension under the M7 Motorway and associated grade-separated cycleway.

Council can provide a copy of the Middleton Drive extension design project and other projects along Bernera Road.

- c) The project is to provide improvements to the existing cycleway along the M7 Motorway, such as grade-separated cycleway at Middleton Grange and Ash Road to address some flooding and drainage issues. A pedestrian and cyclist audit is to be carried out along the existing M7 Motorway cycleway to address any safety and access issues such as lighting and intersection crossings.

- d) Details of the proposed cycling restrictions on the M7 Motorway mainline between the M5 Motorway and Richard Road are to be submitted to the relevant councils and Bike User groups for comments as part of the detailed design.

1.1 Interface projects

Figure 3-4 of the traffic and transport assessment report outlines all road infrastructure upgrade projects interfacing with the proposed modification.

Recommendations

The following projects are to be included in the interface project list.

- Moorebank Avenue upgrade and Cambridge Avenue extension and its connections to the M7 Motorway and Campbelltown Road
- The Middleton Grange Drive extension project
- The Bernera Road/Yarrunga Street/Yato Road intersection upgrade

1.2 Construction traffic impact and management plan

Table 6-8 shows that the estimated traffic volume during Westlink M7 closures is approximately 1,900 vehicles per hour along Kurrajong Road which will exceed its road capacity of 700 vehicles per hour. Alternative detour route is to be identified, particularly heavy vehicles as a result of the proposed M7 closures.

The project will include 50 ancillary facilities located within the Westlink M7 Median, with direct access via the Westlink M7. Each facility will generate up to additional 90 construction vehicle movements per hour and 610 vehicles per day. The construction of the project will result in temporarily closures of the existing Westlink M7 shared path.

The construction of pier and widening structures at bridge widening locations would require temporary lane closures and full road closures on the Hoxton Park Road and Wilson Road, Cowpasture Road and Elizabeth Drive. These roads are major access roads to Liverpool Local Government Area. Detailed traffic impact assessment of temporary road closures on these major arterial roads during construction is to be submitted to Council for comments.

As a result of the above, a detailed construction traffic management plan is to be prepared for construction activities within and outside the M7 Motorway corridor, detailing construction haulage routes, number of trucks, hours of operation, access arrangements, car park provision, pedestrian and cyclist access management plan, and traffic control measures.

Consultation is required with the relevant councils, TfNSW and other stakeholders such as bike user groups for preparation of a detailed site-specific construction traffic management plan and pedestrian and cyclist access management plan during construction.

A community and stakeholder consultation plan is to be developed in consultation with Council for construction of the Project. Notification is required to Liverpool City Council for any major changes to traffic flows along the M7 Motorway such as road and lane closures and traffic diversions.

The project will be constructed between 2023 and 2025, which concurs during the same time periods for construction of other major transport projects, including the M12 Motorway, the Western Sydney International Airport (WSIA), Sydney Metro – WSA and the M5 Motorway traffic improvement works between Hume Highway and Heathcote Road, and the Middleton Grange Drive extension project. Hence, a project construction traffic control group is to be established to coordinate and manage construction traffic activities and disruptions on a wide state road network in Western Sydney.

Recommendations

- a) An overarching construction traffic management plan and site-specific construction traffic management plans are to be developed for the project and associated construction ancillary facilities and compounds in consultation with the relevant councils. The plans are to outline construction staging plans, detailed activities and access arrangement for each construction ancillary facility or compound, construction haulage routes, number of trucks, hours of operation, car park provision, pedestrian and cyclist access management plan, traffic control measures and road safety audits for construction traffic management plans.
- b) A detailed traffic and transport management plan (TMP) is to be prepared for the proposed road closures on major arterial roads such as Hoxton Park Road, Wilson Road, Cowpasture Road and Elizabeth Drive and included as part of a road occupancy license (ROL) application to TfNSW (Transport Management Centre). A copy of the TMP is to be submitted to Council for comment prior to the ROL being issued by TfNSW.

- c) A pedestrian and cyclist management plan is to be prepared in consultation with councils, TfNSW and other stakeholders such as Bike User Groups for any temporary and/or permanent closures of the existing pedestrian and cycling facilities along the M7 Motorway as a result of the Project.
- d) A community and stakeholder consultation plan is to be developed in consultation with the relevant councils for construction of the project. It is to outline community consultation and notification procedure, methods, roles, and responsibility and contact details for any major changes such as road and lane closures, traffic diversion and detours to traffic flows along the M7 Motorway and the surrounding road network as well as disruptions to regular bus services.

A construction traffic control group is to be established to coordinate and manage construction traffic activities and disruptions on a wide state road network in Western Sydney.

2. Environmental Impacts

2.1 Noise and Vibration

It is noted the proponent engaged AECOM Australia Pty Ltd to prepare a traffic noise and vibration assessment report. It has identified that if management measures are implemented correctly, it is unlikely the project would result in vibration damage to heritage or other buildings.

With regards to noise, the project could increase in road traffic noise by more than 2 dB(A) along deviated detour routes. Road traffic noise levels were predicted to exceed relevant criteria at a total of 996 residential receivers and that 250 sensitive receivers would be eligible for feasible and reasonable mitigation measures.

Hence, a need for modification of existing acoustic barriers and new noise walls. Mitigation measures to be implemented for potential noise and vibration impacts were detailed in the report.

Council notes the advice that the project is currently at strategic concept design stage, and as part of the concept design, detailed noise assessment would be carried out to identify locations where noise mitigation measures, including noise walls are to be constructed.

Since the construction of the Motorway, additional residential developments have been constructed in the section of Elizabeth Hills, and the developer installed a noise wall except the section between Dobroyd Drive and Aviation Road. Council has been receiving complaints from the existing residents in this catchment area about road traffic noise from the M7 Motorway operation. Council recommends for a noise wall to be constructed along this road section between Dobroyd Drive and Aviation Road.

Similarly, residents of Cecil Hills, close to the intersection of the M7, Elizabeth Drive and M12, have been expressing concerns about expected additional noise. Council recommends that additional noise barrier and/or noise treatments are to be installed along this section of the M7 and Elizabeth Drive, to mitigate cumulative noise impacts as a result of the M12 Motorway and the project.

Recommendations

Council has been receiving complaints from the existing residents in this catchment area about road traffic noise from the M7 Motorway operation. Council recommends for a noise wall to be constructed along this road section.

Concept and detailed designs are to investigate noise level increases and to consider:

- Installation of a noise wall along the Motorway between Dobroyd Drive and Aviation Road.
- Installation of additional noise barrier and/or noise treatments along the section of the M7 Motorway, Cecil Hills close to its intersection with Elizabeth Drive and the M12 Motorway, to mitigate cumulative noise impacts of the proposed modification.
- Consideration should also be given to the following site-specific noise controls that may be implemented to minimise noise levels below the relevant Noise Management Levels:
 - minimising the need for vehicle reversing by arranging for one-way site traffic routes
 - using broadband audible reverse alarms, as opposed to beepers, on relevant plant and equipment to be used on-site
 - where practicable, minimise the number of high noise generating plant items operating concurrently
- Require the preparation of a Construction Noise and Vibration Management Plan and complaints' handling procedure prepared under the supervision of a suitably qualified acoustic consultant.
- The Construction Noise and Vibration Management Plan must identify and implement strategies to minimise noise from the proposed construction activities and incorporate approaches for promoting noise awareness by contractors; training procedures; a complaint lodgement procedure to ensure that members of the public and local residents are able to report noise issues; an ongoing review process and a plan for responding to noise complaints.

The Construction Noise and Vibration Management Plan shall clearly specify the responsibilities of site personnel in managing noise and include a detailed list of steps taken to manage potential noise impacts. The Construction Noise and Vibration Management Plan and complaints' handling procedure shall be submitted to the consent authority for review.

Significant advancements have been made to audible reversing alarms. As a result, there is a range of alternatives to the traditional reversing signals capable of providing a safe system of work, whilst also reducing noise impacts. Apart from broadband alarms, these include variable-level audible alarms, focused tonal alarms, non-audible warning systems, proximity alarms, spotters or observers and exclusion alarms. To ensure compliance with work, health and safety requirements, further advice should be sought from SafeWork NSW.

In accordance with the NSW EPA's Road Noise Policy (2011), mitigation strategies should be considered in a hierarchical approach by first controlling noise at the source. Once the controls at the source are exhausted, the transmission of noise is to be controlled. Once source and transmission controls are exhausted, mitigation measures at noise sensitive

receivers are to be considered. Therefore, the Department must ensure that source and transmission controls are exhausted prior to further consideration of reasonable and feasible at-property treatments for any affected receivers.

It is also recommended that the Department requires acoustic reports and noise and vibration management plans to be prepared or reviewed and certified by a suitably qualified acoustic consultant who is a member of the Australian Acoustical Society or employed by an Association of Australasian Acoustical Consultants (AAAC) member firm.

2.2 Soils and Contamination

The concept and detailed designs is to include an assessment to address possible soil contamination. If required, the Remedial Action Plan shall be referred to the consent authority for review.

Recommendation

The concept and detailed design is to include an assessment to address possible soil contamination. If required, the Remedial Action Plan shall be referred to the consent authority for review.

A Site Audit Statement and Site Audit Report prepared by a NSW EPA Accredited Site Auditor shall be submitted to the consent authority for review and approval confirming that:

- The nature and extent of contamination has been appropriately determined at the proposed development site
- The investigation, remediation or management plan is appropriate for the intended purpose
- The site can be made suitable for the proposed land use in accordance with the submitted Remediation Action Plan (if required).

2.3 Air Quality

Council notes that AECOM has advised that air quality impacts associated with the proposed development's operation were 'minor' and changes to the Project design were not recommended. The consultant confirmed that construction and operational air quality impacts are unlikely to have a significant impact on ground level concentrations.

Recommendation

An Air Quality Management Plan including, a description of the measures to be implemented to ensure compliance with the conditions of consent, an air quality monitoring program for the construction and operational phases, best practice management; and mitigation of air quality impacts during worst case meteorological conditions, is to be prepared and submitted to the Department.

In addition, a comprehensive monitoring is to be carried out during the construction and operational phases of the project to encourage environmental best practice and facilitate adherence with the Approval and Environment Protection Licence (if applicable).

2.4 Water Quality Impacts

The proposed development has the potential to increase stormwater flows due to the increased surface area of impervious materials. Construction activities may also result in erosion and sedimentation issues. A Construction Environmental Management Plan will be required for the proposed development to mitigate potential impacts upon receiving waters.

Recommendation

To mitigate potential risks to human health and the environment, it is requested that the Department takes the following matters into consideration.

2.5 Other Concerns and Recommendations

Appropriate Regulatory Authority

'Road construction' is identified in Schedule 1 of the Protection of the Environment Operations Act 1997 as a scheduled activity requiring an Environment Protection Licence. It is likely that the proposed works would be classified as a scheduled activity and require an Environment Protection Licence under the Protection of the Environment Operations Act 1997.

Construction Environmental Management Plan

A detailed Construction Environmental Management Plan (CEMP) must be prepared for the project. The CEMP must address all environmental aspects of the development's construction phases, and include, where relevant, but not be limited to, the following:

- a) Asbestos Management Plan
- b) Project Contact Information
- c) Site Security Details
- d) Timing and Sequencing Information
- e) Site Soil and Water Management Plan
- f) Noise and Vibration Control Plan
- g) Dust Control Plan
- h) Health and Safety Plan
- i) Waste Management Plan
- j) Incident Management Contingency
- k) Unexpected Finds Protocol

3. Urban Design and Landscaping

It is noted that the project would affect a number of viewpoints along the Motorway. The viewpoints within the Liverpool LGA, that have a High or High to Moderate adverse impacts rating by the project need to be mitigated through the incorporation of public art. This needs to be done in consultation with Council's Public Arts Officer.

Recommendation

The Public art is to incorporate into the viewpoints as listed in table 7-82 Visual Impact Assessment Summary with overall ratings of High or High to Moderate. Mitigation measures should then be provided on within Table 7-83 Mitigation Measures in consultation with Council's Public Arts Officer.

4. Stormwater and water quality

Construction activities may result in erosion and sedimentation issues. A Construction Environmental Management Plan is to be prepared to mitigate potential impacts upon receiving waters.

The project is to include mitigation measures that would minimise impact of flooding and water quality during/prior to construction.

Council notes that the existing stormwater management infrastructures including detention basins and water quality treatment trains had been designed to accommodate a future widening of the road and pavement into the median.

Recommendations

A CEMP is to be prepared to identify strategies to mitigate potential impacts upon receiving waters.

5. Tolls

Council notes that tolls would continue to be charged through the construction phase and that motorists would continue to pay based on distance travelled capped at 20km. Council also notes that the tolls are adjusted based on the consumer price index each quarter.

The project report indicates various options are being investigated to fund the project. Council notes that travel demand on the Motorway would increase with the planned M12 Motorway and Western Sydney Airport development.

At its meeting on 31 August 2022, Council discussed the Motorway widening and resolved that: this submission includes a request for no additional toll charges above "standard adjustments" or toll periods to justify the construction of additional lanes be levied on the M7.

Council also knows that the M12 Motorway is being delivered as a fully toll free road by the state government and that Liverpool Council supports this arrangement.

Recommendation

Council requests that no additional toll charges above "standard adjustments" or toll periods to justify the construction of additional lanes be levied on the M7 Motorway.