



Your ref: SSI-663-MOD 6
File no: MC-22-00002

30 August 2022

NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Recipient Delivery Jonathon.Kerr@planning.nsw.gov.au

Attention: Jonathon Kerr

Dear Mr Kerr

State Significant Infrastructure-663-MOD 6- Widening of M7 Motorway

Please find attached comments from Blacktown City Council in relation to the proposed widening of the M7 Motorway.

The project is a State Significant Infrastructure proposal under Section 5.12 of the *Environmental Planning and Assessment Act 1979*, extending from Prestons to Oakhurst.

The proposed modification has been developed in response to an unsolicited proposal prepared by the current operators of the M7 Motorway. Council understands that the government has been actively considering the proposal for some months. However, the State Government has seen fit not to brief Councils in advance and has provided the community and Councils 21 days to digest the details and prepare submissions.

The proposed modification to the existing consent is expansive in area and has complex relationships with a wide range of transport and community considerations.

Blacktown City Council wishes to object to the proposal for a range of reasons, including:

- The tokenistic nature of the engagement with Councils and the wider community, most likely contrary to the Secretary's Environmental Assessment Requirements
- The opportunistic nature of the project and its lack of integration and co-ordination with other important considerations, in particular:
 - The general lack of any strategic basis for the proposal in State Government plans
 - Flood evacuation
 - Compliance with previous conditions of consent in relation to public transport
 - The future design and upgrade of Richmond Road
 - The design of junction of the M7, Castlereagh connection and Richmond Road
 - The provision of regional road infrastructure within the North West Growth Area
 - The various transport associated design shortcomings of the current proposal
 - The failure of the project to explore opportunities to respond to local circumstances and knit communities back together
 - The failure of the design to address issues associated with urban heat
 - Noise mitigation for operational impacts is insufficiently explored.

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

Email: council@blacktown.nsw.gov.au - Website: www.blacktown.nsw.gov.au

All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

- Furthermore, Blacktown City Council requests that any information provided by the proponent in relation to the matters raised by Council, be referred back to Council for reconsideration before any determination is made by the Department of Planning and Environment.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully



Peter Conroy
Director Planning and Development

Blacktown Council's submission to SSI-663-MOD 6: M7 Motorway Widening.

Contextual Issues

- **History of M7 and original M7 Approval**
- **Changes in Western Sydney since that time**
- **State Infrastructure Strategy 2022 - 2042**
- **Future Transport Strategy 2056**
- **Metropolitan Plan**
- **District Plans**
- **Outer Orbital**
- **Northwest Growth Sector**
- **Metropolitan Resilience**
- **Castlereagh Connection**
- **Richmond Road**
- **Flood Evacuation**
- **Failure to consider local documents and circumstances**
- **Lack of consultation**
- **Land acquisition**

Traffic Concerns

- **Operational traffic impacts and concerns**
 - **South facing ramps**
 - **North Facing Ramps**
- **Operational intersection performance impacts the wider road network**
- **Choke point – Richmond Road and M7**
- **Cycleway network connectivity**
- **Construction traffic impacts and concerns**
- **Concluding traffic comments and recommendations**

Environmental Concerns

- **Climate change**
- **Climate change opportunities**
 - **Active Transport and Public Transport**
 - **Vegetation and canopy cover**
 - **Design**
 - **Urban Heat**
 - **Water cycle management**
 - **Materials**
- **Operational Noise Impacts**

Social Planning Concerns

- **Social Impact Assessment - use of LGA-wide SEIFA and IER ratings rather than ratings for the social locality**
- **A focus on impact during construction and Inadequate assessment of ongoing operational impacts**
- **Failure to consult with councils as key stakeholders**
- **Failure to directly address community concerns Increased traffic volume and impacts on surrounding Road Network**

- **Active transport connections and movements across road reserve**
- **Upgrade of shared path**
- **Noise and air quality**
- **Toll charges**

- **History of M7 and original M7 Approval**

Project approval for the Western Sydney Orbital was granted on 28 February 2002 to construct a 40 km freeway linking the M5 at Camden Valley Way to the M2 at Baulkham Hills – Refer SSI-663. The approved project comprised 4 lanes of traffic, pedestrian / cycle paths and a 15m wide median to facilitate the future provision of public transport. The project was opened in December 2005. The following original conditions of approval are relevant to the current proposal:

Public Transport Enhancement Measures

Pre-construction Stage

36. The Proponent shall, in consultation with the DoT, design the Project to accommodate the future provision of public transport facilities. Consideration shall include but not be limited to, the requirements for bus and light rail stops/stations, bridge crossings, vertical and horizontal clearances and alignments, and pedestrian and bicycle access such that retrofitting for dedicated public transport use is not precluded in the future.

In addition to condition 36, condition 42 required the proponent (operator) to regularly review the operation of the freeway and assess the potential demand for public transport services.

Operation Stage

42. Five (5) years after the opening of the Project to traffic and every ten (10) years subsequently up to 25 years, the Proponent shall review the potential demand for dedicated public transport services on the Project to the satisfaction of the Department of Transport and shall implement any such measures as agreed between the Proponent and the Department of Transport.

The exhibited documents dismiss the need for public transport and do not provide any analysis of future likely need for public transport along the motorway.

Section 4.2.9 of Modification Report states the following:

As described in Chapter 3 (Need for the modification and strategic context), current transport strategies do not identify the Westlink M7 as a strategic public transport route. However, the design of the proposed modification would not preclude use of the motorway for public transport facilities (e.g. on the new traffic lanes) in the future should there be a change to strategic transport policies.

Whilst there is a statement that the proposed works do not preclude future use of the motorway for public transport facilities, no analysis, investigation of the costs of retrofitting a future public transport option, or other evidence is provided to support this statement. It is a fundamental requirement of the original consent (Condition 42 above) for the motorway that the need for public transport be reviewed 5 years after opening and then every ten years.

The most recent of these reports should be included in the exhibited documents in addition to cost benefit analysis of how public transport could be accommodated in the widening proposal.

Modifications to the Original Approval

The current approval has been modified on previous occasions, namely:

Reference	Nature of Modification sought	Approval Date
Mod 4	Removal of requirement to maintain pedestrian and cycle access across the M7 at Rooty Hill	24 January 2006
Mod 5	Removal of prohibition on commercial outdoor advertising	18 July 2019

Both of these modifications worked to the advantage of the proponent/ operator.

Mod 4 reduced the annual operating costs whilst at the same time further dislocating local communities located on either side of the freeway.

Mod 5 increased the income flow as a result of increased revenues flowing from the commercial outdoor advertising.

- **Changes in Western Sydney since that time**

Blacktown City has 48 suburbs and 142 schools with several more proposed in the rapidly expanding new housing developments in the North West Growth Area suburbs including Marsden Park, Schofields and Riverstone.

The city has experienced rapid growth in our resident population and the size of our economy. From 2016 to 2021, the residential population grew from 348,000 to 395,000 people and our economy grew from \$17.3 billion to \$22 billion. Blacktown City now has the largest population in New South Wales, the 3rd largest economy in New South Wales by Gross Regional Product, and the 2nd fastest growing economy.

Blacktown City's current population of 400,000 people and is projected to be more than 522,000 by 2036 - an increase of almost 1/3rd (31%) in just over 15 years. Blacktown now manages 1,466km of roads - over 90% of the total road network, comprising 1,379km of Local roads and 89km of Regional roads.

The impacts of COVID-19 on Western Sydney clearly highlighted the importance of Western Sydney to Sydney's supply chain, housing construction and employment opportunities.

New housing developments in the north west growth area are placing ever increasing demands on local transport infrastructure and highlighting the need for injection of funds to address a range of current transport issues. For example, the need to widen Richmond Road. Richmond Road is a state arterial road. Transport for NSW project documents advise that the existing road network does not have the capacity to meet the expected growth in transport demand that will result from the increased population and new homes. In the next 5 years to 2026, Richmond Road traffic is estimated by Transport for NSW to almost double from 34,300 to 65,600 vehicles each day.

- **State Infrastructure Strategy 2022 – 2042**

The updated State Infrastructure Strategy 2022 – 2042 makes specific references to:

- Lifting the performance of Greater Sydney
- Supporting emerging industries in the Western Parkland City
- Supporting accessibility and the liveability of the Central River City.

However, at no point in the document does it make any reference to the M7 and/or increasing the capacity of the M7 Motorway.

- **Future Transport Strategy 2056**

Future Transport 2056 devotes an entire Chapter (Chapter 8) to the *Greater Sydney Network*. – Refer Pages 125 – 142. In doing so the document considers issues associated with:

- The 30-minute city and the role of public transport
- The need to invest in mass transit to shape a sustainable urban form and grow jobs in the Western Parkland City
- The protection of the Western Sydney freight line connection to Port Botany
- Lifting the performance of Greater Sydney
- Supporting emerging industries in the Western Parkland City
- Supporting accessibility and the liveability of the Central River City.

At no point in the document does it make any reference to the M7 or increasing the capacity of the M7 Motorway.

- **Metropolitan Plan**

The Metropolitan Plan notes:

- the unprecedented levels of housing development that is increasing the demand on infrastructure and services across the region
- increasing community standards in relation to the quality and timely provision of infrastructure, amenity and place
- that as Greater Sydney grows and becomes more complex, there is a need to design better ways of supporting growth and delivering appropriate infrastructure in the right places.
- the need to act in ways that give the community confidence that the region is being planned and developed responsibly and sustainably
- the need to foster and co-ordinate a whole-of-government approach to the provision of appropriate infrastructure in the right places to support growth
- its relationship with Future Transport 2056 and the State Infrastructure Strategy 2018–2038.

Specific actions and objectives from the Plan relate to Infrastructure and Collaboration and include:

- The coordination land use and infrastructure to align growth with infrastructure
- Prioritising infrastructure investments to deliver maximum benefits for the community.

The Metropolitan Plan makes no specific observations or recommendations in relation to increasing the capacity of the M7 Motorway.

- **District Plans**

The M7 Motorway traverses two of the three District Plans, commencing at Camden Valley Way – in the Western Parkland City and concluding at the M2 – in the Central River City. Likewise, the location of the currently proposed development runs between Prestons – in the Western Parkland City and concluding at Richmond Road – in the Central River City.

As with the Metropolitan Plan, the two District Plans makes no specific observations or recommendations in relation to increasing the capacity of the M7 Motorway.

- **Outer Orbital**

Transport for NSW consulted on a proposed corridor for the Outer Sydney Orbital for a possible future motorway and freight rail line. The consultation period finished in June 2018.

In response, the State Government resolved to:

- Continue with the previously gazetted 1951 corridor for the Bells Line of Road Castlereagh Connection
- Relinquish the section of the Outer Sydney Orbital north of Richmond Road
- Provide for a future tunnel of approximately 10 kilometres from Cobbitty to Cawdor to minimise the impact of the Outer Sydney Orbital on communities at Cobbitty, Brownlow Hill, Grasmere and Ellis Lane.
- Delete the proposed rail loop through the Dunheved Industrial area.

The currently proposed Outer Sydney Orbital does not integrate with the M7 Motorway as it is currently proposed to terminate at Richmond Road. This will cause substantial traffic congestion and delays along Richmond Road.

- **Northwest Growth Sector**

In 2014, the NSW Government released its North West Growth Centre Road Network Strategy to support the forecast growth in the North West Growth Area. This strategy provided for the upgrade of 5 regional roads plus associated rail crossings and included:

- Bandon Road – to be provided when 25% of development within the Growth Area was completed.

Development in the North West Growth Area is currently estimated at 38% complete, yet there is still no commitment to commencing the Bandon Road upgrade and extension, nor even commencing design.

- Garfield Road – to be provided when 75% development within the Growth Area is complete.

As with the other nominated upgrades, Garfield Road provides a strategically important east-west link through the North West Growth Area, connecting Richmond Road and Windsor Road (State Arterial Roads). It currently intersects with the Richmond Railway Line at-grade and functions as the 'main street' through Riverstone.

A grade-separated railway crossing has appeared in NSW Government documents for over two decades. In 2014, the NSW Government prepared a design to replace the at-grade rail crossing with an overpass along the Garfield Road corridor. It required the acquisition of businesses on the southern side of Garfield Road, effectively removing its function as the main street of the Town Centre.

Transport for NSW has recently advised that it is now commencing a re-investigation of options to upgrade Garfield Road through the Riverstone Town Centre, including an option to locate the rail line over Garfield Road.

- **Metropolitan Resilience**

Sydney's current State Road Network, as it extends to the North and the West is restricted by the local geography. Options for motor vehicles moving to and from the North and West are limited to 2 main all weather routes, the Pacific Highway and the Great Western Highway.

As a consequence, incidents on either route lead to congestion and delays, impacting on all things ranging from journey to work to transport and logistics. A more resilient State Road Network is required to accommodate the shocks and stresses that arise as a result of these incidents.

In the case of Western Sydney, a second high-level crossing of the Hawkesbury River is required, thereby facilitating a viable alternative route to Western NSW via the Bells Line of Road.

- **Castlereagh Connection**

As stated earlier, the Castlereagh connection corridor was gazetted in 1951. The Castlereagh connection is proposed to intersect with the M7 at its junction with Richmond Road.

Completion of the Castlereagh connection would play a significant role in establishing a viable alternative route to Western NSW via the Bells Line of Road. It would also remove traffic from the already chronically congested Richmond Road.

The design of the interchange at the intersection of the Castlereagh connection, the M7 and Richmond Road needs to be progressed as a matter of priority. Any upgrade of the M7 Motorway needs to be able to accommodate the proposed interchange design.

- **Richmond Road**

Richmond Road is a key commuter and freight route. It links the Marsden Park Business Park with the M7 Motorway. It also provides an alternative route over the Blue Mountains to Western NSW. It is already operating above capacity with traffic struggling for most of the day through heavily congested Marsden Park.

The future Outer Sydney Orbital does not integrate with the M7 Motorway as it is currently proposed to terminate at Richmond Road. This will cause substantial traffic congestion and delays along Richmond Road.

The traffic report identifies traffic increases across the wider road network, as a result of the M7 attracting traffic from the surrounding network.

Traffic modelling identified that congestion will worsen to level of service (LOS) E and F in the morning or afternoon peaks. This will require upgrade of the Richmond Road intersections at Rooty Hill Road North and M7 entry and exit ramps.

The major intersection interchange of Richmond Road with M7 and Rooty Hill Road North is the key network choke-point that causes traffic congestion along:

- Richmond Road eastbound towards Symonds Road
- Along Richmond Road west through Marsden Park
- Along Rooty Hill Road North south towards Luxford Road

- Causes traffic to queue on the northbound M7 Motorway exit ramp to Rooty Hill Road North and Richmond Road.

Transport for NSW estimates that Richmond Road traffic flow will increase significantly, from regional background traffic and the redevelopments of Marsden Park and Marsden Park North:

- Richmond Road in 2018- 34,300 vehicles per day
- Estimate for 2026 - 65,600 vehicles per day (almost twice that in 2018)
- Estimate for 2031 - 78,500 vehicles per day - Bandon Road connected to Richmond Road
- Estimate for 2036 - 80,500 vehicles per day (more than twice that in 2018)

In the next 5 years to 2026, Richmond Road traffic flow is estimated by Transport for NSW to almost double from 34,300 vehicles per day to 65,600 vehicles per day.

Any proposal to increase the capacity of the M7 needs to be developed in the context of the surrounding road network and the need to co-ordinate actions so as to avoid adverse impacts elsewhere.

- **Flood Evacuation**

The State Government's *Resilient Valley, Resilient Communities* flood risk management strategy for the Hawkesbury Nepean Valley was released in 2017. The study noted at the time that

"up to 134,000 people live and work on the floodplain and could require evacuation. This number is forecast to double over the next 30 years."

Richmond Road will be a key element of any evacuation strategy. As stated above, Richmond Road is already at capacity and as a consequence its ability to fulfil this flood evacuation role will be limited by:

- its inability to accommodate additional vehicle movements in a short period of time
- the weather conditions that are likely to be prevailing at the time.

Resolving the current capacity and design issues associated with Richmond Road need to be dealt with as a matter of priority and in advance of any upgrade of the M7.

- **Failure to consider key documents and local circumstances**

The exhibited documents fail to address key state and local council strategy documents. The proposal does not enhance the environment where it is located, nor does it improve accessibility and connectivity for communities and public spaces.

Western Sydney and Blacktown in particular has changed dramatically since the M7 Motorway was designed and constructed in the early 2000's. Whilst the M7 off road cycleway and the links to adjacent residential areas may have been state of the art in 2002, today in 2022 it falls well short of what the Western Sydney communities affected by the M7 need and deserve.

The widening of the M7 is a once-in-a-lifetime opportunity to restitch communities that were severed by the construction of the M7. Such a project can provide existing and new communities with walking and cycling access to regional and local facilities like the Western Sydney Regional Parklands.

The State Government has a suite of initiatives to encourage active transport that promote and recognise its benefits. There is a great opportunity for this project to ensure that the people of Blacktown and Western Sydney enjoy improved and excellent active transport routes along and across the M7. Given the user catchment of the existing M7 cycleway, the whole of Sydney would benefit from the incorporation of appropriate conditions in relation to additional active transport elements.

The proposal to widen the M7 Motorway fails to address specific requirements of the Secretary's Environmental Assessment Requirements (SEARs) relating to active transport and improving accessibility and connectivity for communities and public spaces. The widening proposal does not provide for any enhancement in the active transport between the areas severed by the motorway or strategically analyse the M7 cycleway. No investigation of increased active transport needs since the motorway was initially built has been undertaken within the exhibited documentation.

The proposal ignores the negative and permanent effects of the motorway on people movement. The documents narrowly focus on vehicle movement along the motorway when they discuss improving connectivity. Improving connectivity for other forms of transport, such as active transport is ignored. The proposed widening does not align to the guiding principles of the Future Transport Strategy 2056, nor has early collaboration with stakeholders taken place.

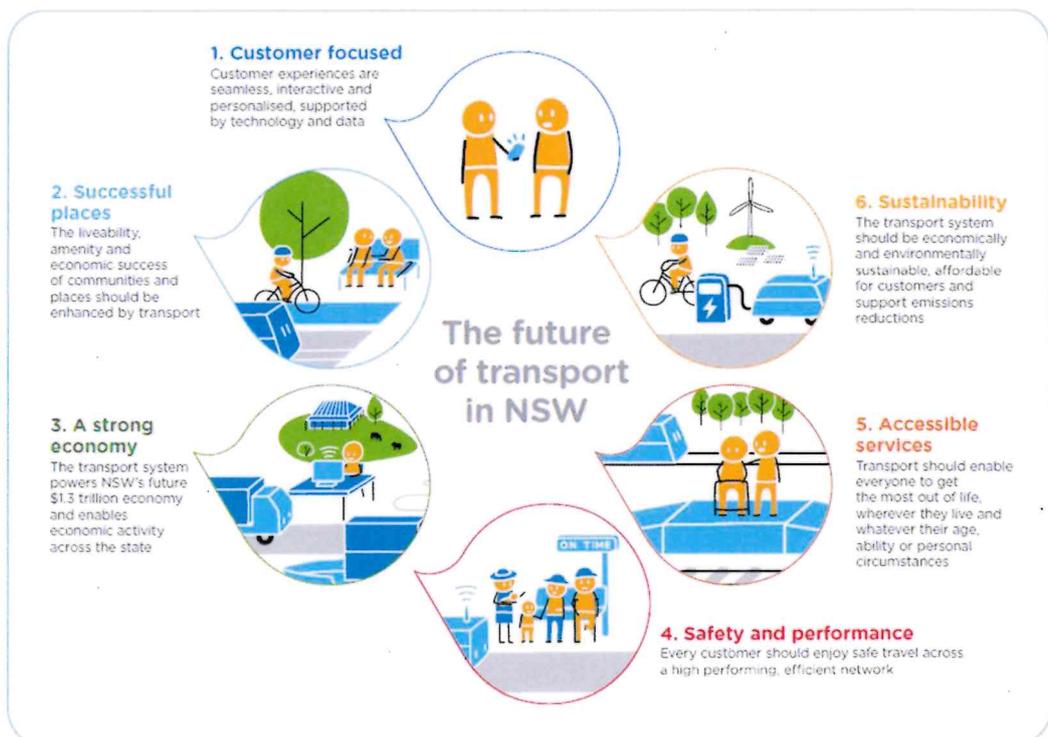


Figure 1: Future Transport 2056

The project documentation fails to review the implications of a number of changes that have occurred in Western Sydney and how these changes manifest in the need for improved access across the motorway for local and regional communities.

Examples include the following:

- Since 2002 the vast majority of the Western Sydney Regional Parklands are now open to the public. The parklands extend and straddle the majority of the M7 motorway
- Ignoring the regional attractions that have been developed, are underway or are planned that create the need for improved connections between communities severed by the M7 such as the *NSW Disability Centre of Excellence* - Blacktown and the *Blacktown Exercise Sports and Technology Hub* which is currently under construction and due for completion in early 2023
- Ignoring the increased density of development expected around existing heavy rail infrastructure and growth and redevelopment occurring or planned in areas adjacent to the M7
- Ignoring changing travel needs resulting from population growth and facilities provision
- Failing to analyse Blacktown's population change and the implications of these changes. Blacktown has grown from 216,974 in 2001 to 399,711 in 2021 and is forecast to grow to 522,000 people by 2036
- Failing to analyse or comment on the implications of rise in popularity of cycling as a means of commuter and recreational transport
- Failing to analyse or comment on the rise of e-transit (micro mobility) alternatives
- Failing to consider the commencement of Australian Catholic University at the Blacktown Sports Park in 2021 and the need to provide active transport link from Rooty Hill station across the motorway to the Blacktown Sports Park
- Does not seek to achieve the State Government's targets to increase walking and cycling mode share despite the obvious opportunities that exist to do so
- Does not explore in any meaningful way (using available data and analysis) the further potential of the M7 cycleway to enhance walking and cycling mode share either along the cycleway or across it. In this regard, limited (no off-road cycle way count information, only on-road cyclists have been identified) counting and assessment of the impact on the many thousands of cyclists who use the M7 cycleway appears to have been undertaken
- Greatly ignores and underplays the importance of the M7 cycleway to all Sydneysiders, not just Western Sydney residents – no usage data for this cycleway is presented.

The Strava heat map below shows comparatively how popular the M7 cycleway is in the context of Sydney metropolitan cycling (Note: the brighter line indicates higher cycle traffic)

Strava Cycling Heat Map 17/5/22



Blue dot = Blacktown CBD

Source: <https://www.strava.com/heatmap#17.08:150.96824:33.762811bbe/ndc>

The Proposal has failed to strategically assess the contribution of the M7 cycleway is making to active transport in Western Sydney and how it links to and could enhance the wider active transport and public transport networks.

Additionally, it does not review the current operation, fabric and environs of the M7 cycleway. Nor does it identify any upgrades or changes that would improve user experience, safety, amenity or connections to surrounding areas.

The proposal purports to have consulted with the community, but confined this consultation to a very narrow band of land beside the motorway corridor. The survey focussed on interim construction impacts/inconvenience. No conversation about wider active transport needs or ideas for active transport improvements or indeed environmental improvements were canvassed with the community.

There is no discussion or analysis about Western Sydney as a place and its character and how that character is evolving. The proposal fails to contribute to enhancement of 'place' along the entire motorway, there are no proposals for additional public art, lighting features, entry statements to suburbs or improved wayfinding. There is no analysis of the public domain and place making contribution that the motorway could make nor is there any comparison to other contemporary motorway projects that do this in Australia and worldwide.

Delivering for people and places

Place-based planning recognises that every place is unique and that transport infrastructure and services need to reflect local character and the movement needs of the local community. Place-based planning also responds to the broader challenges facing metropolitan and regional areas, such as adapting to a changing climate, changing demographics, population growth, and supporting healthy lifestyles and social interaction.

A place-based approach to the planning, design, delivery and operation of transport networks recognises the network of public spaces formed by roads and streets, and the spaces these adjoin and impact.

Places also have a complementary relationship with transport networks - movement supports better places by providing connectivity and integrating the movement of people and goods, and transport networks are most rational and productive where they connect and improve the places they serve. This is why we are partnering with local councils and other stakeholders from the start of the planning process to establish a common understanding of local challenges and opportunities, develop a shared vision for land use and transport for the future, co-design ideas and prioritise solutions.

Figure 2: Future Transport 2056

- **Lack of consultation**

Consultation has been perfunctory, is flawed and in some cases the consultation results reported are very misleading, for example:

Appendix C the Summary of Stakeholder Consultation reports that a briefing was offered to Council on June 17 and that no response was received from any of the affected Council's or the major utility agencies. It must be noted that **no briefing** was offered in the June 17 email to Blacktown City Council. This email merely advised that our opportunity to comment was during the upcoming exhibition period.

The Secretary's Environmental Assessment Requirements (SEARs) require that the proposal be informed by consultation with local, State and Commonwealth government agencies. It is clear that the documents have not been informed by consultation. Only during the exhibition phase, was a briefing offered to Council. An email offering a briefing was sent to Council on the 10 August – 7 days after the formal exhibition period commenced.

- **Land acquisition**

Property acquisition was a key condition of the original development approval SSI-663. Condition 172 (below) specifically related to the matter of property acquisition.:

Property Acquisition

Pre-Construction

172. The Proponent shall identify all properties to be affected by land acquisition and complete negotiations with landholders prior to construction commencement and in accordance with the RTA's Land Acquisition Policy. Where a mutually acceptable arrangement cannot be made using this method, the Proponent shall ensure that the acquisition of any land shall be in a responsive and sensitive manner and in accordance with the Land Acquisition (Just Terms Compensation) Act 1991. The Proponent shall consult affected landowners prior to and during the property acquisition process in accordance with the requirements of Condition No. 174.

Council is yet to receive compensation for a number of land parcels that are being used for motorway purposes despite multiple requests that this matter be finalised. The following land parcels remain in council's ownership.

After 17 January 2003

Lot		Plan	road name	Notes	Owner
26-45		DP806052	Phillip Parkway	public road (CAR)	Council
14		DP806053	Phillip Parkway	public road (CAR)	Council
46	814.3m ²	DP806052	Mavis Street	public road (CAR)	Council
47	1525m ²	DP806052	Dunsmore Street	public road (CAR)	Council
48	3542m ²	DP806052	Crichton Street	public road (CAR)	Council

Traffic Concerns

- **Operational traffic impacts and concerns**

The M7 Motorway is currently chronically congested particularly for southbound traffic, and also has limited south-facing and west-facing ramps for access to and from the proposed Western Sydney Airport.

Access to the M7 Motorway could be improved by providing additional south-facing and west-facing ramps, to improve access to and from the Western Sydney Airport for Western Sydney residents, at the following intersections:

- Eastern Road, Doonside – south-facing ramps
- Quakers Hill Parkway – west-facing ramps

M7 does not have any south-facing ramps between Old Wallgrove Road at Eastern Creek and Woodstock Avenue at Rooty Hill. This results in chronic congestion along Wallgrove Road and Main Road 537 including Wallgrove Road and Rooty Hill Road South.

M7 does not have any west-facing ramps between Sunnyholt Road at Acacia Gardens and Richmond Road at Glendenning. This results in chronic congestion along Richmond Road especially and also Sunnyholt Road.

Richmond Road is a key freight route linking Marsden Park Business Park with the M7 Motorway that is already operating above capacity with traffic struggling for most of the day through heavily congested Marsden Park.

The future Outer Sydney Orbital does not integrate with the M7 Motorway as it is currently proposed to terminate at Richmond Road. This will cause substantial traffic congestion and delays along Richmond Road.

To resolve this concern the northern end of the Outer Sydney Orbital must not be terminated at Richmond Road.

- **Operational intersection performance impacts the wider road network**

The traffic report identified traffic increases across the wider road network with the proposed widening, as a result of the M7 attracting traffic from the surrounding network.

Traffic modelling identified that congestion will worsen to level of service (LOS) E and F in the morning or afternoon peaks. This will require upgrade of the following nearby intersections:

- Richmond Road at Rooty Hill Road North and M7 entry and exit ramps
- Great Western Highway at Rooty Hill Road South and Wallgrove Road
- Wallgrove Road at Old Wallgrove Road and M7 entry and exit ramps

- **Richmond Road at M7 intersection choke-point**

The major intersection interchange of Richmond Road with M7 and Rooty Hill Road North is the key network choke-point that causes traffic congestion along:

- Richmond Road eastbound towards Symonds Road,
- Along Richmond Road west through Marsden Park,
- Along Rooty Hill Road North south towards Luxford Road, and
- Causes traffic to queue on the northbound M7 Motorway exit ramp to Rooty Hill Road North and Richmond Road.

Transport for NSW estimates that Richmond Road traffic flow will increase significantly, from regional background traffic and the redevelopments of Marsden Park and Marsden Park North:

- Richmond Road in 2018- 34,300 vehicles per day
- Estimate for 2026 - 65,600 vehicles per day (almost twice that in 2018)
- Estimate for 2031 - 78,500 vehicles per day - Bandon Road connected to Richmond Road
- Estimate for 2036 - 80,500 vehicles per day (more than twice that in 2018)

In the next 5 years to 2026, Richmond Road traffic flow is estimated by Transport for NSW to almost double from 34,300 vehicles per day to 65,600 vehicles per day.

- **Construction traffic impacts and concerns**

Temporary road closures and associated traffic diversions would only occur at night-time to allow critical construction works. Restricting traffic diversions to commence after 10pm at night is supported, as the estimated traffic volumes for diversions starting at 9pm are more than the workday peak hour traffic volumes on:

- Wallgrove Road
- Woodstock Avenue
- Power Street

The traffic impact assessment identifies that peak hour traffic volumes on Wallgrove Road will increase by 18% from 242 construction vehicles using this road.

- **Summary and recommended actions to address operational concerns**

Whilst the upgrade and widening of the M7 Motorway may have some merit in terms of reducing the traffic congestion experienced by current users of the M7, it will do little to address a wider range of transport concerns.

In this regard, the proposal may improve access to the Western Sydney Airport, however it will not address issues associated with current traffic or expected future increased traffic from the growth in new homes from the rapidly expanding North West Growth Area and South West Growth Areas.

The proposal put forward by the applicant does not adequately respond to the requirements of the Secretary's Environmental Assessment Requirements (SEARs) and does not adequately address deficiencies identified in the traffic impact assessment.

The following specific actions are therefore suggested to address the operational deficiencies and concerns identified.

- 1) M7 Motorway:
 - a) Proposed M7 widening to be extended from Richmond Road to the M2 Motorway at Windsor Road – this will provide a consistent 3-lanes in each direction and improve access for Western Sydney residents to and from the proposed Western Sydney Airport.
 - b) Additional south-facing ramps at Eastern Road – this would reduce congestion identified at intersections along main roads including Wallgrove Road and Rooty Hill Road South, and improve access to and from the Blacktown International Sports Park, nearby sporting fields, Mount Druitt Fire Station, Mount Druitt Police Station, Mount Druitt Hospital and the new West HQ entertainment venue on Francis Road at Sherbrooke Street.
 - c) Additional west-facing ramps at Quakers Hill Parkway – this would reduce congestion identified at intersections along main roads including Richmond Road at M7 Motorway and Rooty Hill Road North, and improve access to the Western Sydney Airport for residents in the rapidly growing North West Growth Area.
- 2) Increased traffic from growth and also attracted by the upgrade of the M7 will require the upgrade of the following main roads connecting to the M7:
 - a) Main Road link 537 to be widened to 4 lanes along Francis Road, Railway Street, Duke Street, Woodstock Avenue and Rooty Hill Road North, including duplication of the Davis Overpass of the Great Western Rail line at Rooty Hill.
 - b) Widen Wallgrove Road to 6 lanes from Wonderland Drive at Eastern Creek to Great Western Highway, including across the M4 Motorway bridge.
 - c) Widen Richmond Road to 6 lanes from east of Yarramundi Drive Dean Park to South Creek bridge at Marsden Park.

- **Cycleway network connectivity**

Additional Shared user path cycleways are required to improve cycle access to and from M7 cycleway network, including along:

- Richmond Road
- Great Western Highway
- Francis Road
- North Parade for access to Rooty Hill Station

Additional shared user paths along Richmond Road to connect the cycleway network to the M7 at Richmond Road. Several missing sections are identified along Richmond Road from Balmoral Street at Blacktown to Richmond Road at the South Creek bridge.

Environmental Concerns

- **Climate change challenges:**

The M7 Motorway is a major arterial road used by heavy transport running along the east transport corridor of Australia. Additionally, it will become one of the main routes to and from Sydney's second airport. There are limited rail and public transport options for transporting goods and individuals between north-west and south-west Sydney and the current planning approach largely relies on heavy road transport and private vehicles.

It is to be noted that whilst the proposal acknowledges increasing traffic, there is no direct consideration of climate and the requirement to curb emissions.

It is to be noted that the proposal entails significant vegetation clearing and only includes biodiversity offsets to balance these losses. There is no discussion of tree and vegetation planting close by the proposed upgrade nor consideration of potential for increases in urban heat.

- **Climate change opportunities:**

Notwithstanding that fact that previously conditioned public transport options have not been publicly explored - if at all, the proposed upgrade offers opportunities for large-scale environment and climate future-proofing. Considerations such as reduced carbon emissions, improved construction practices, integrated water cycle management and the delivery of greenery to address urban heat, create air filtering and buffer zones for residents and wildlife, need to be incorporated into the project.

In order to progress the Premier's Priority of Greening our City commitment - to plant 5 million trees in Greater Sydney by 2030 for more shade and cleaner air, the proposal should incorporate extensive tree-planting along the road corridor. In addition to benefits for the local micro climate, such initiatives would also enhance the overall design and visual amenity of the road corridor.

To help achieve the NSW Government objective of a 50% cut in emissions by 2030, a new "Urban Heat" driven approach to design is required. This major arterial upgrade should:

- Explore designs that reduce areas of pavement exposed to sunlight
- Incorporate the use of extensive areas of tree canopy, integrated with water cycle management, to reduce urban heat and enhance cooling
- Focus on tendering that requires use of the lowest embodied emissions construction materials and recycled materials wherever possible
- Include charging/fuelling infrastructure for low emission energy e.g. hydrogen fuelling stations and electric vehicle battery charging or swap-over stations that accommodate heavy, light commercial and passenger vehicles.

- **Operational Noise Impacts**

It is to be noted that there is strong emphasis on construction impacts in terms of noise however there is limited input on operational noise impacts to residents around the M7 transport corridor. As noted earlier, the M7 being a major arterial road carrying both heavy road transport and private vehicles will result in increased noise impacts on residents from increased traffic volumes. The Noise and Vibration report must explore operational impacts and mitigation measures on nearby residents in greater detail.

Social Planning Concerns

- **Summary of Council's Social Impact concerns**

The Social Impact Assessment prepared by AECOM Australia Pty Ltd fails to meet the Department's requirements for the preparation of Social Impact Assessments. The Department's new Social Impact Assessment guidelines require all State Significant Development's and State Significant Infrastructure proposals to engage in a clear and consistent approach to Social Impact Assessment preparation. The guidelines require Social Impact Assessment to be developed in accordance with the Department's framework and for either a Social Impact Management Plan (SIMP) or clear, conditionable mitigations to be identified. Furthermore, the Social Impact Assessment provided in respect of the project:

- does not capture the compounding operational impacts of the development
- uses misleading demographic statistics to develop its recommendations
- is inadequate and misleading, it lacks rigour and credibility. The widening proposal should not and cannot be assessed without a comprehensive Social Impact Assessment. A new report is required.

- **Specific Areas of concern:**

- **Generalised use of LGA-wide SEIFA and IER ratings rather than ratings for the social locality defined in Section 4 of the Social Impact Assessment.**
The report is misleading in its description of that part of the social locality in the Blacktown local government area. While Section 4 of the Social Impact Assessment clearly identifies the locality as being the area surrounding the MY corridor, City-wide averages for SEIFA and EIR are cited. While Blacktown City has some extraordinarily advantaged suburbs, the Doonside/Mount Druitt area straddling this locality contains Australia's most disadvantaged urban communities. 8 suburbs in the area are in the bottom 3% of IRSD ratings. 9 out of 10 of

Sydney's most affordable suburbs are in this area. The area is noted for its generational disadvantage and high levels of poverty.

- **A focus on impact during construction and an inadequate assessment of ongoing operational impacts.**

It is evident there will be social impacts during construction that will need to be mitigated during that period. The report is correct in observing that regulatory controls and conditions of approval will effectively deliver the mitigations for these impacts, however it then devotes lengthy sections to dealing with these. It provides far less analysis or identification of potential ongoing operational impacts on traffic, amenity and cohesion. It is to be noted that these were identified in the SEARS consultation process.

- **Failure to consult with councils as key stakeholders, as required by SEARs**

The consultation process appears to have been severely truncated, and consisted of a random sample of selected sections of some communities. This limited consultation excluded key stakeholders including councils, schools, major retail and State government agencies.

- **Failure to directly address concerns raised by the community in the limited consultation that did occur.**

The Social Impact Assessment reports benefits and concerns raised by community in the consultation, particularly in relation to the operational phase, but does not address these or provide mitigation strategies.

- The above identified shortcomings occurred despite the Social Impact Assessment acknowledging these items were required. The Social Impact Assessment acknowledges that:

"an assessment of the following issues must be undertaken in accordance with the commitments in Attachment 2 of the Westlink M7 (SSI 663) – Project Modification letter submitted 9 May 2022":

- *Assess potential social impacts of the project from the points of view of the affected community/ies and other relevant stakeholders (i.e. how they expect to experience the project). How environmental changes and impacts arising from the construction and operation of the project may affect:*

- *health and wellbeing*
- *people's way of life and livelihoods*
- *surroundings (including natural values) and culture, including the connection and value place on the land by local Aboriginal communities*
- *affected communities, including composition, cohesion and people's sense of place; access to and use of infrastructure, local services, and facilities."*

- **Key operational impacts need to be addressed including:**

- **Increased traffic volume**

While the Social Impact Assessment rightly observes the benefits of increased traffic flow on the M7, it provides no analysis of the capacity of the surrounding road system to cope with an increased traffic flow. While upgrades are occurring to several of these roads, other roads are currently failing to cope – the upgraded Richmond

Road is already failing, without a potential increase in volume. Increased traffic volumes and the failure of surrounding road networks would significantly impact the quality of life and wellbeing of those communities and impair the amenity and safety of surrounding suburban roads.

This issue goes directly to the community's concerns about traffic and congestion, and feeling safe and secure, and their desire for reduction of congestion. The Social Impact Assessment needs to address the ongoing mitigation of these issues during operation.

- **Active transport connections and movements across road reserve**

The M7 already presents a considerable east-west barrier within the communities through which it passes. Crossings and connections are heavily vehicle dominant and present significant safety challenges for the young, elderly and people with mobility challenges. Non-vehicle crossings are primarily associated with the shared path and are spaced at substantial intervals. Blacktown Council is seeking to add a pedestrian pathway to a creek crossing to provide an underpass near Blacktown International Sports Park, but there are few other underpass opportunities.

This lack of permeation presents significant barriers to community connection and cohesion and should be addressed in the Social Impact Assessment. This would also reflect the community value identified in the consultation of 'Sense of community'.

- **Upgrade of shared path**

The Social Impact Assessment notes the amenity of the shared path will be impacted by the road widening, at least with regard to aesthetics. The lack of greening and trees, together with the projected increase in days over 35 degrees in western Sydney will result in a general heating of this path. The Social Impact Assessment should address this effect and the community value identified in the consultation of 'Parks and landscape features', by considering the installation of water stations and shaded rest areas.

- **Noise and air quality**

The Social Impact Assessment notes the potential health impacts of poor air quality – respiratory health issues, asthma, allergies – and noise – sleep disturbance, annoyance, children's school performance and cardiovascular health. The Social Impact Assessment addresses these factors during construction, but both will continue to be significant impacts during operation. The Social Impact Assessment mentions the apparent installation of additional noise barriers but provides no detail of these. The Social Impact Assessment notes an Air Quality Assessment of Pollutants predicted emissions of carbon monoxide and particulate matter would increase but noted 'these predictions are relatively minor in the context of the NSW EPA criteria.'

- **Toll charges**

No mention was made of toll charges in the Social Impact Assessment. Any increase in tolling of roads in western Sydney would increase the burden on the highest tolled population grouping in the country. The already-high rates of social disadvantage and poverty in the area would severely impact the communities along the M7 corridor.