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Department of Planning, Industry and Environment
GPO Box 39
Sydney
NSW 2001

Attn: Director Transport Assessments

26 November 2019

Dear Sir/Madam,

BHL – ADDENDUM TO SUBMISSION TO EXHIBITED M12 MOTORWAY EIS – PREFERRED ROUTE CORRIDOR & REFINED ROUTE CORRIDOR

This letter is submitted as an addendum to the submission prepared by Urbis on behalf of Boyuan Holdings Limited (BHL Group) in response to the public exhibition of the Environmental Impact Statement (EIS) for the future M12 Motorway which has been declared critical State Significant Infrastructure under section 5.13 of the Environmental Planning and Assessment Act 1979 (EP&A Act 1979).

BHL has an interest in a landholding located at 1953 – 2109 Elizabeth Drive, Badgerys Creek (the land/landholding) which is significantly impacted by the proposed M12 alignment which includes both the M12 corridor and interchange to the proposed airport access road.

The addendum submission relates to the significant differences between the preferred route corridor alignment announced in November 2016 and the refined route corridor announced in February 2018 (refer **Figure 1** overleaf) and the additional impacts that this change in alignment will have on the subject landholding. The EIS states in Section 4.3 that a key assessment criterion for the route options was *'the integration with current and future land uses (that is non-sterilising)'*.

As shown in **Figure 1 Picture 1** the original 2016 alignment of the airport access road runs in a predominantly straight line from north to south between proposed M12 interchange and the boundary of Western Sydney Airport. This alignment logically follows the existing property boundary between the subject landholding and the adjacent landholding to the east. The 2016 alignment would ensure that the land take required for the airport access road could be equitably split between the adjacent land holding to the east. The 2016 alignment would also shift the airport access road carriageway and interchange into the areas more highly constrained by aircraft noise allowing a wider range of land uses to be considered in the less constrained areas of the subject landholding.

The refined preferred route corridor shown in **Figure 1 Picture 2** moves the proposed interchange westwards providing a more angled north south road corridor than the 2016 alignment. Alignment means that approximately 11.79ha of the subject landholding will be severed to the east of the airport access road. As shown in **Figure 2** the RMS proposes to compulsorily acquire this severed portion of land on which the EIS states will be utilised for Ancillary Facility 3.

Figure 1 Preferred Route Corridor (2016) vs Refined Preferred Route Corridor (2018)

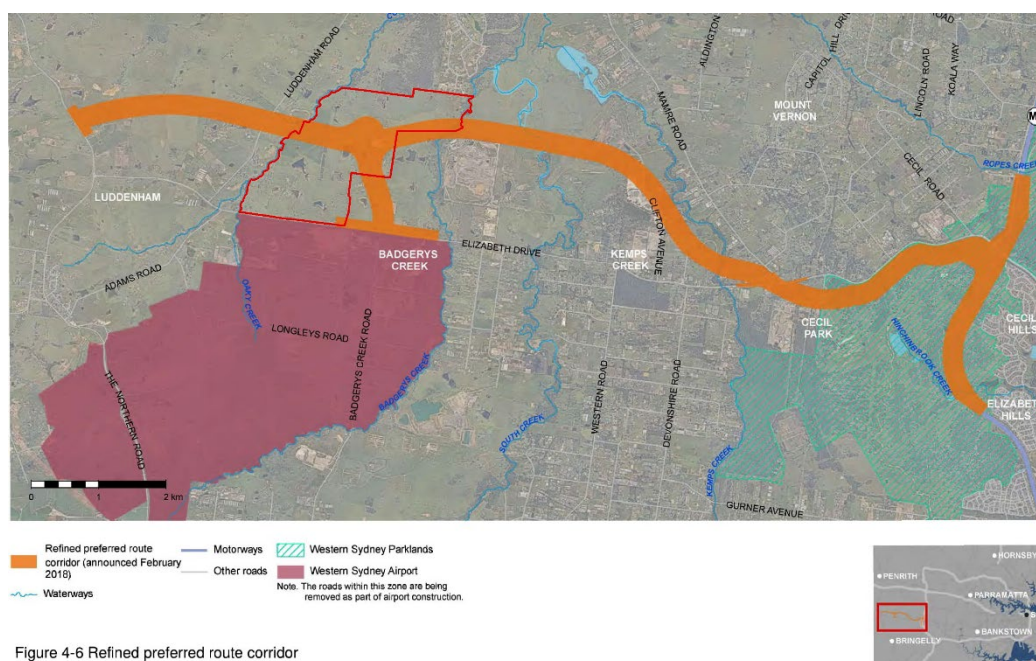
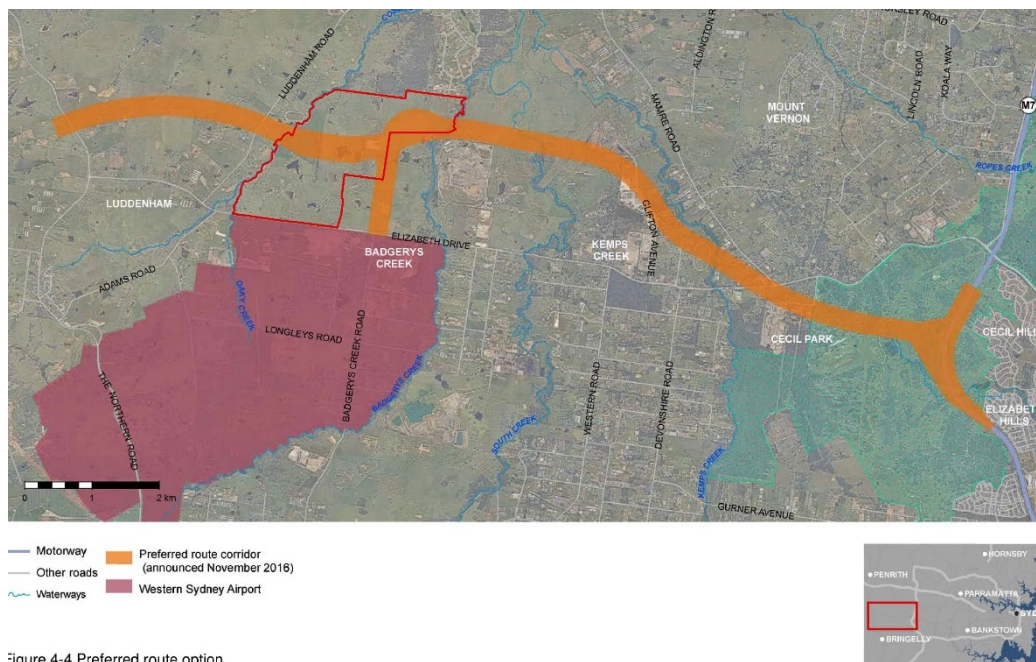
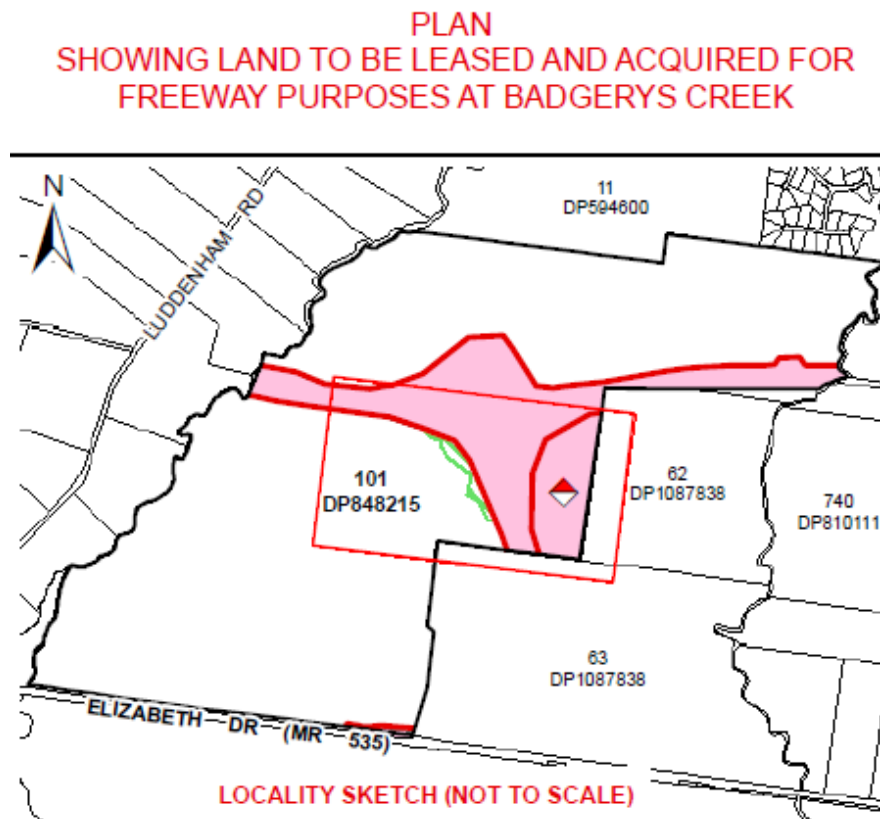


Figure 2 Proposed Acquisition Areas



LAND TO BE ACQUIRED FOR FREEWAY PURPOSES
TOTAL AREA ABT 47.29 ha

SEVERED LAND TO BE ACQUIRED
TOTAL AREA ABT 11.79 ha

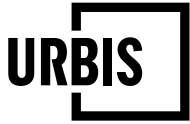
LAND TO BE LEASED FOR CONSTRUCTION PURPOSES
TOTAL AREA ABT 1.71 ha



Source: RMS, 2019

The impact of this change in alignment increases the already significant amount of land within the site that would be affected by proposed infrastructure corridors and associated land acquisition.

The change in alignment would further reduce the opportunity to create a large consolidated developable area on the central and southern portions of the landholding. The alignment would unnecessarily fragment and sterilises the site which is contrary to the assessment criteria utilised for the route options.



Avoiding unnecessary land fragmentation will ensure the orderly and timely development of land consistent with broader land use planning objectives as currently detailed in the Stage 1 LUIIP. As such, BHL submit that the straighter 2016 alignment for the airport access road must be reconsidered to minimise the amount of land acquired by the RMS for the M12 corridor in addition to increasing the amount of developable land on of what is the largest englobo landholding to the immediate north of the Western Sydney Airport.

BHL appreciates the opportunity to submit this addendum to its submission response to the public exhibition of the EIS for M12 Motorway and would welcome any opportunity to participate in ongoing dialogue and meet with the Department of Planning Industry and Environment (DPIE) and the RMS to discuss their submission in further detail.

If you have any questions, please don't hesitate to contact either the undersigned or Mr Christophe Charkos of this office on (02) 8233 9900.

Yours sincerely,

A handwritten signature in black ink, appearing to read "David Hoy". The signature is fluid and cursive, with a long, sweeping underline.

David Hoy
Director
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