



16 Memorial Avenue
PO Box 42
Merrylands NSW 2160

T 02 9840 9840
F 02 9840 9734
E hcc@holroyd.nsw.gov.au
www.holroyd.nsw.gov.au

DX 25408 Merrylands
TTY 02 9840 9988
ABN 20 661 226 966

Environmental & Planning Services Department

Our Reference:
Contact:
Telephone:

HC-22-03-1/03
Michael Rogers
(02) 9840 9656

10 September 2014

Project number SSI 6148
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam

SUBMISSION TO WESTCONNEX M4 WIDENING EIS

Thank you for the opportunity to comment on the EIS for the WestConnex M4 widening project. Please find attached Holroyd Council's submission.

Should you require any further information regarding Council's submission, please contact Michael Rogers of Council's Strategic Planning section on 9840 9656.

Yours faithfully

Merv Ismay
GENERAL MANAGER

Per: Adan Davis
MANAGER STRATEGIC PLANNING

Submission to EIS for proposed WestConnex M4 Widening

This submission has been prepared by Holroyd City Council in relation to the Environmental Impact Statement (EIS) for the proposed widening and upgrade of the M4 Western Motorway between Pitt Street, Parramatta and Homebush Bay Drive, Homebush.

Holroyd City Council supports the investment in transport infrastructure that will benefit the Western Sydney region and welcomes the opportunity to provide input into the process for delivering the M4 widening as part of the WestConnex project.

The submission provides comments on the EIS, specifically regarding the following issues:

- Traffic and Transport
- Noise
- Visual amenity, built form & urban design
- Soils, water and waste
- Biodiversity
- Heritage
- Air quality
- Community engagement

Holroyd City Council supports the WestConnex M4 Widening subject to the consideration of the matters raised in this submission.

Traffic and Transport

The following comments are provided in relation to traffic & transport matters:

1. The network modelling should include in its analysis all future growth in the region including the proposed Badgerys Creek Airport, Greystanes Southern Employment Land, southwest and northwest residential land releases, M5 widening, Wet n Wild (and other major traffic generators), as well as the opening of the southern section of Reconciliation Road, Parramatta Ring Road and any other significant traffic generators, attractors and road infrastructure projects.
2. The proposed motorway widening is between Pitt Street overbridge, Holroyd and Homebush Bay Drive, Homebush. The eastern extent of the traffic modelling (intersection analysis of the surrounding road network) is to Parramatta Road, Burwood which is east of the proposal however the western extent is only to the Church Street interchange, Parramatta which is east of the Pitt Street overbridge.

The traffic study should be extended to the west of proposal and include key intersections within Holroyd LGA such as Burnett Street/Great Western Highway, Coleman Street/Great Western Highway, Great Western Highway/Cumberland Highway, Coleman Street interchange, Burnett Street interchange, etc. This is to capture the impact of additional traffic on the surrounding road network and above intersections/interchange due to the increased capacity of the M4 Motorway and likely shift of the 'bottleneck' to a section of the motorway which is not being widened (i.e. west of the Pitt Street

overbridge). This is demonstrated in the report which indicates that queuing on the Cumberland Highway westbound off-ramp will double in length in the future in the morning peak.

Intersection improvement measures to manage the traffic increases at these intersections/interchanges should be included as part of this project.

3. The intersection analysis does not indicate other 'measures of effectiveness' such as queue lengths and degree of saturation. The impacts of queuing at the motorway on-load ramps will significantly affect the surrounding road network (i.e. blocking of intersections). Therefore, appropriate traffic management measures will need to be provided to ensure that queuing will not extend past the on-load ramps. This is particularly important for the intersection of Church Street with Woodville Road and M4 Motorway interchange which the study indicates will operate at LOS F.
4. Details of the tolling system will need to be provided in terms of collection locations and costs. This is important in the assessment of likely usage or bypassing of the motorway.
5. The traffic study indicated that that WestConnex Stage 1 – M4 Widening will result in significant traffic issues unless the full WestConnex project (including the M4 East extension, M4 South and M5 East) is realised. Therefore it is paramount that the commitment from the State and Federal Governments is given to completing the full project.
6. The Westmead and Parramatta connections have been omitted from the project due to network integrations and preliminary investigation issues. This will result in more pressure on the existing interchange at Church Street/Woodville Road, Granville and Cumberland Highway, Greystanes as well as the surrounding road networks including Great Western Highway and other collector/local roads. Intersection improvement measures to increase capacity at the interchange and road network need to be provided as part of this project.

It was noted that the NSW Government has committed to provide funding to further develop the Parramatta ring road concepts. It is imperative that this study be undertaken as a priority as the outcome will have a significant impact on the WestConnex project.

7. The traffic study and modelling should be extended to assess the impact of increased traffic on the local and collector road network resulting from traffic bypassing the motorway due to introduction of tolls and bypassing bottlenecks that result at the end of the widening extent. The installation of traffic calming measures on the local and collector road network should be provided as part of this project. The traffic study should be undertaken prior to the construction and the study area will need to be monitored and reviewed following opening of the project. Any proposed treatment/s as a result will be subject to the Holroyd Traffic Committee consideration and Council's approval. Affected roads in Holroyd LGA include Merrylands Road, Old Prospect Road, Centenary Road, Sherwood Road, Fowler Road, Burnett Street, Pitt Street, Neil Street, Boundary Street, Railway Street, Walpole Street, Hawkesview Street, etc).

8. Concerns are raised regarding the westbound on-ramp/off-ramp which will merge/exit on the middle lanes of the motorway. This unconventional treatment results in unsafe weaving which is experienced on the existing Bradfield Highway at Milsons Point.
9. The proposed configuration of the M4 Motorway which reduces the number of lanes in the eastbound direction from 4 lanes to 2 lanes east Homebush Bay Drive will likely cause a 'bottle neck' which will increase delay and reduce travel time on the motorway for eastbound motorists.
10. Bus priority treatments and bus lanes should be implemented / considered as part of this project similar to the bus lanes on M2.
11. Regional and local cycleway links should be included as part of the project such as the missing link between Merrylands and Mays Hill (i.e. between Ledger Road and Franklin Street).
12. Traffic will divert to the surrounding road network during construction phase. Detailed impact assessment should be undertaken identifying temporary traffic management measures. All traffic management proposals on local roads are subject to approval of the Holroyd Traffic Committee. Extensive consultation and notification with the community will need to be undertaken well in advance of construction. Access for any over size and over mass vehicles require approval from the National Heavy Vehicle Regulator, Roads and Maritime Services (State Roads) and Council (Local Roads) through the Holroyd Traffic Committee.

Noise and vibration

A review of the noise impacts associated with the M4 Widening project indicates that noise emissions following the widening of the motorway will on average will be slightly lower at premises within the Holroyd Local Government Area. The acoustic study notes that lower noise levels will result from resurfacing of the roadway with low noise asphalt, as well as decreased traffic volumes due to toll avoidance.

The study identifies that the existing sound barriers between Pitt and Church Street Granville shall remain, and in parts be extended in height. The resultant works will ensure noise levels at premises comply with the RMS road noise policy.

As it is anticipated construction work will be carried out over a 2 year period the anticipated works have been assessed against the EPA Interim Construction Noise Guideline. It is noted based on worst case scenario noise mapping that construction noise will be 'moderately intrusive' to some residents within the Holroyd LGA north of the motorway, but in all other areas will not be intrusive. The report details construction planning methods which will minimise noise as far as possible. It is noted that works will be subject to an Environmental Protection Licence issued by the NSW EPA, with the EPA regulating noise from the activity. It is recommended that all residents within the vicinity of works or site compounds are provided with information on the works schedule and a point of contact in regards to any concerns they may have regarding vibration and noise issues.

Visual amenity, built form and urban design impact assessment

A review of the EIS indicates that the M4 widening will not have a significant impact on the adjoining properties within Impact Zone 1 – Parramatta/Holroyd. It appears that the most significant impacts will come from the noise walls, which are proposed to be replaced in some sections with those that are higher than the existing walls. This mostly affects the area near the off ramp at Church Street on the northern side, where it adjoins a residential area, and a section near Holroyd Sportsground. The heights for the walls in these areas will range from 6.5m-7.5m respectively and be 4.5m in other areas. It is proposed to retain the vegetation buffer next to the walls to ensure visual amenity is maintained. This may result in some loss of views on the southern side but this is not considered to be a significant impact, which appears accurate.

With regard to vegetation and landscaping, creek restoration works to disturbed areas on the southern side and the creation of strong vegetation markers to improve the Church Street entry to Parramatta are proposed. The landscape tree feature treatment, a formal arrangement of Hoop Pine (*Araucaria cunninghamii*) between the M4 Church Street on/off ramps, should be retained and protected in order that the original intention of creating this significant entry point feature is fully realised. The trees are at an early stage of maturity and the visual effect of the tree plantings would be compromised by removal of any of the trees.

The use of feature and linear lighting is proposed for areas under the viaduct that incorporates Crime Prevention Through Environmental Design (CPTED) principles. The installation of interpretive artwork expressing Parramatta both underneath the viaduct and on the noise walls is also proposed.

The widening will impact A'Becketts Creek Canal and the shared path facility, creating a more dominant appearance than at present. This is not considered to have a major impact on the existing character of the area and the primary disruption will be the possible closure of the cycle/pedestrian facility during construction.

In accordance with the objectives of the M4 widening project, greater consideration should be given to the undercover area of the current and proposed viaduct, between Church Street, Junction Street, A'Becketts Creek and the railway underpass. The current amenity of the under-cover area is limited by anti-social behaviours caused by the shelter provided by the existing viaduct, and additional viaduct coverage is expected to exacerbate this issue. It is therefore recommended that the potential for a more beneficial or constructive utilisation of the area, as well as improved urban design outcomes, be investigated. This should include the acquisition/amalgamation of the covered properties for the provision of community open space, the dispersal of carriageway stormwater runoff for the irrigation of the covered ground below, and the provision of greater integration of the overall landscape treatment of the covered area including paving, vegetation and decorative lighting.

It appears that generally the concept design of the carriageway, viaduct and entire corridor would create a positive outcome in relation to visual amenity and urban design. The proposal incorporates a simple, uniform and contemporary design and would create improvements through enhancing vegetation along the corridor. The positive outcome

of the proposal could be further enhanced by avoiding impacts on existing landscape features and investigating improved utilisation of the area underneath the viaducts.

Soils, water and waste

A review of the contamination report included in the EIS indicates that soil and ground water testing was undertaken along the route within the Holroyd LGA. No contaminants of concern were identified within the Holroyd LGA except for minor groundwater contamination near Church Street. The report notes that should significant contamination be unearthed as a part of bulk earthworks an environmental consultant shall be engaged to determine management options. The report concludes that there will be no adverse human health impacts as a result of the proposal.

There is potential for Acid Sulfate Soils to occur within the study area. The EIS specifies that an Acid Sulfate Soils Management Plan would be prepared to manage any potential impacts arising from disturbance of these soils. As such, there are no concerns about impacts associated with Acid Sulfate Soils.

Biodiversity

Following review of the EIS in relation to biodiversity matters, there are no concerns regarding impacts on native vegetation, threatened species or endangered ecological communities. There are no recorded threatened species within the Holroyd LGA. The existing vegetation within the Holroyd LGA portion of the study area is already considered disturbed and there is no land within the study area that is identified on the Holroyd Local Environmental Plan (LEP) 2013 Biodiversity Map.

There is a freshwater drainage line along the southern side of the M4 between Woodville Road and the Western Railway line that is mapped on the Holroyd LEP 2013 Watercourse map, and this would be impacted by the proposed widening. Any works within this watercourse or riparian land should be undertaken in accordance with the measures documented in the WestConnex M4 Widening Biodiversity Assessment (Jacobs SKM, 2014).

Heritage

An analysis of the heritage impact components associated with the M4 Widening EIS has also been undertaken and the following matters are raised for consideration.

The Heritage study does not highlight all heritage items within the vicinity of the study area from Holroyd LEP 2013, specifically properties located on Tottenham Street Granville. While these properties may not be directly impacted by the works, they should be added to the maps in the report for accuracy.

It is noted that there is a difference between the heritage properties mapped and those that are investigated and assessed within the report. This should be indicated in the report to resolve any confusion.

It is also noted that a site work compound near Church Street may be in the vicinity of a heritage item located at No.14 Meehan Street, Granville. It is recommended that, as stated in the noise and vibration impact assessment report, a building condition survey be undertaken for the property before and after the works and a Construction Noise and Vibration Management Plan (CNVMP) be prepared and implemented.

The proposed works do not appear to impact on heritage item Vauxhall Inn, which is located within the study area.

Air Quality

A review of the air quality study indicates that there will be no discernable decrease in air quality as a result of the project.

Socio-economic considerations

The Socio Economic Assessment (Appendix M), prepared by Jacobs and dated 16 July 2014, details the project methodology, project scope, socio-economic environment, impact assessment and potential mitigation measures. In addition to the comments raised in relation to social issues under the Visual amenity, built form and urban design impact assessment, the following comments relate to the impact assessment and mitigations with respect to Social Infrastructure, Community Values, Local Amenity and Access and Connectivity.

With respect to each of these subjects the assessment identifies 'potential construction impacts', 'potential impacts during operations' and potential mitigations during 'preconstruction and design', 'construction' and 'operations'.

Due to the location of the proposed widening, commencing at the municipal boundary, at Church Street in the north eastern corner of the LGA, the social impacts within Holroyd City are likely to be minimal.

The key identified positive social impacts include improved access to local and regional infrastructure (including community services and facilities), improved travel reliability and improved urban amenity in some areas (e.g. Parramatta Road)

Most of the negative social impacts are associated with the construction phase of the project and include noise and dust, traffic disruption in some areas and impacts on pedestrian and cycle networks.

The majority of the impacts – both positive and negative – will occur in Parramatta and Auburn LGA's. In Holroyd the major potential impacts relate to the use of Holroyd Sportsground and the M4 cycle path during the construction phase of the project.

If the Holroyd Sportsground is used as a compound for construction management, there will be significant impacts (in terms of disrupted access and/or noise, dust, parking and traffic. Sufficient compensation would be required to address the opportunity cost of 'loss' of the park or parts of it during the construction phase.

The M4 cycle way is an off-road shared cycle path paralleling the M4. It runs from Wing Parade in Newington to Fox St in Holroyd, with connections to bicycle routes to Parramatta and Olympic Park at either end. Approximately 30-40 cyclists used the path at Holroyd West on an average weekday in the 12 months to February 2014. It is an important regional link and it is important to maintain continuity wherever possible through the construction phase (either on the current or via an alternate alignment).

The Assessment identifies a range of mitigations – including:

- The consideration of opportunities to improve local pedestrian and cycle connectivity as part of the project design
- Identify locations for site compounds that minimise impacts on local communities
- Ensure site compounds are adequately fenced
- Maintain access for pedestrians and cyclists near construction works, and
- Maintain access along pedestrian and cycle paths, including the cycle way beneath the M4 Motorway and on the M4 Motorway shoulders where it is currently permitted

It is recommended that the importance of the proposed mitigation measures be reinforced and that they be included as conditions of development consent.

Community Engagement

The principle concern in relation to the community engagement process that has been undertaken as part of the M4 Widening EIS process relates to the timeframe that has been provided for submissions. Given the size of the documentation that makes up the EIS, allowing only one month to provide feedback is inadequate for fully considered submissions to be made. Similarly, the short timeframe would not allow many local councils to review the EIS and report the findings to a council meeting. An exhibition period of at least double the time provided is necessary for effective feedback to be provided.

In addition, the EIS documentation does not provide any clear indication that the exhibition materials are available in different languages. The information flyer provided with the EIS appears to only provide limited translation services.

Finally, engagement with the business community and especially the businesses that will be most affected by the proposal should be specifically targeted for their feedback on the proposed M4 Widening.

Conclusion

Holroyd City Council supports the WestConnex concept and welcomes the investment in infrastructure that will benefit the Western Sydney Region. Matters raised in this submission are provided for consideration, and it is anticipated that these issues will be adequately addressed prior to final determination of the project.