

Mr Kane Winwood  
Team Leader  
Transport Assessments  
Department of Planning & Environment  
GPO Box 2001  
**SYDNEY NSW 2000**

Dear Mr Winwood

**Re: The Northern Road Upgrade (SSI 7127) – Notice of Public Exhibition**

Council welcomes the opportunity to provide comments on the Environmental Impact Statement (EIS) for The Northern Road Upgrade between Mersey Road and Glenmore Parkway.

Council also notes that the project is a part of the State and Federal Government's \$3.6 billion Western Sydney Infrastructure Plan to improve the road network required to service the Western Sydney Airport.

The southern portion of the project between Mersey Road and Elizabeth Drive is in the Liverpool Local Government Area (LGA). Council appreciates that Roads and Maritime Services (RMS) representatives have provided briefings to Council on the scope, design investigations, key features and benefits of the project.

Council supports the project and delivery plan as part of the Western Sydney Airport ground transport improvement works. Council's specific comments on the project and EIS are as follows:

**Traffic Assessment**

Council appreciates that the project includes two traffic lanes and a bus lane in each direction.

It is noted that traffic assessment has been undertaken for 2031 traffic conditions. Stage 1 of the Western Sydney Airport is scheduled for completion by 2030, with further stages to follow. As The Northern Road is a significant north-south road corridor adjacent to the airport, it is important to ensure that the project is designed to cater for long-term growth.

The traffic assessment should cater for 20-30 year growth to ensure that adequate road reservation is identified at major intersection points as part of the project. To this end, it is suggested that TfNSW Land Use Forecasts for 2051 are used for additional traffic modelling.

Council also notes that the section of the project in the Liverpool LGA includes two proposed signalised intersections with an access road to the Western Sydney Airport, and a realigned Elizabeth Drive. The intersection layouts are based on forecast 2031 traffic conditions.

To accommodate future traffic conditions, Council suggests that provision (i.e. road reservation) should be made for full or partial grade separation at these intersections. In addition, the intersection with the proposed M12 Motorway should be considered as a grade separate intersection.

### **Freight**

The Northern Road is a significant north-south freight route and the Airport will be expected to generate significant freight movements. Therefore, consideration should be given to the provision of heavy vehicle facilities including parking bays.

### **Need for Bus Shelters**

Council suggests that for uniformity, the project should include appropriate bus shelters with real time bus service information along its entire length.

### **Need for a shared path along both sides of the road**

Council notes that the project currently includes a shared path along the western side and a provision of a footpath along the eastern side of the road. The Northern Road is a major north-south regional bicycle route, and it is suggested that in addition to the shared path on the western side, a shared path should be provided along the eastern side.

### **Noise Mitigation Measures**

The project is to ensure that existing properties that would be exposed to increased traffic noise are assessed and if required, attenuation measures are implemented.

### **Construction Traffic Management**

Council requests that where local roads will be affected during construction, Council and local communities are to be appropriately informed. Appropriate road occupancy permits are to be obtained prior to commencement of construction works. Copies of construction traffic management plans and associated traffic control plans during different construction stages are to be submitted to Council.

*Traffic noise* - It is noted that night-time construction activities would be supported by out-of-hours operation. Noise mitigation measures should be provided in accordance with EPA requirement.

*The need for interim intersection improvements along Elizabeth Drive* - It is noted that a number of major construction works, including the following, will occur at the same time within the local region and result in increased construction vehicles:

- The Northern Road upgrade between Glenmore Parkway and Jamison Road;
- Earth work on the Western Sydney Airport site; and
- Bringelly Road upgrade (Stage 1 and 2).

Due to the increase in volume of construction vehicles along Elizabeth Drive, it is suggested that interim treatments such as traffic control signals be provided at the following intersections:

- Elizabeth Drive/Western Road intersection
- Elizabeth Drive/Devonshire Rd intersection

Council also suggests that the existing applicable 80 km/hr speed limit along Elizabeth Drive, near Western Road, is to be relocated further west of the Kemps Creek Village.

*Adams Road Bridge* - The proposed bridge across Adams Road is to include appropriate provision for future four lane road widening and safety barriers.

**Handover of the existing road section through Luddenham Town Centre**

Council notes that as part of the project, The Northern Road is being realigned to bypass Luddenham Town Centre. Council agrees with this arrangement as it will preserve the residential amenity of the Luddenham Town Centre; however, the bypass could have significant impacts on the existing businesses in the town centre that rely upon passing traffic.

Council requests that funding be provided for appropriate signage and consultation with the business in the town centre to ensure the impact of the bypass can be minimised and for the centre to attract some passing trade.

The bypass may change the road classification and maintenance responsibilities of the road section through the Luddenham Village. In this regard, Council requests that the RMS and Council enter into a Memorandum of Understanding on future road classification, maintenance responsibilities, and financial implications on the road section through the Luddenham Village.

**Environmental Impact Statement - Flooding, drainage and water quality**

The project includes crossings at Badgerys Creek, Cosgrove Creek and Duncans Creek, and a number of minor drainage systems.

**Mainstream and Overland Flooding** - The proposed road upgrade works will involve filling a number of existing farm dams, removal of earth dams and upgrade of spillways of existing dams.

Council notes that the road works may increase the frequency and/or depth of overtopping the earth embankment and result in an increase in both the rate and volume of runoff discharging to a number of receiving waterways.

The project is expected to increase peak flows with associated increase in scouring. Impacts and comments on the three creeks to be impacted are as follows:

**Cosgrove Creek** - Peak flows at the project boundary will increase by up to 100%. While a number of flood mitigation measures have been proposed, there would be residual impacts including an increase in peak flood levels by up to 300mm.

**Duncans Creek** - Peak flows will increase by more than 100%. While mitigation works have been proposed, there will also be residual impacts of flooding and flood levels by up to 50mm. Upstream of Duncans Creek, the project would result in an increase of flood levels up to 500mm in a 100 year flood event.

**Badgerys Creek** - Two (2) existing properties located upstream of Badgerys Creek crossing would be adversely affected by flooding.

**Request for additional flood modelling**

It is noted that flood modelling has been undertaken for 2, 10, 100 year Average Recurrence Intervals (ARI) and the Probable Maximum Flood (PMF) events. Council considers that additional flood modelling shall be undertaken for 20 year event and a flood impact assessment shall be undertaken for all the design events.

### **Additional drainage comments**

The project involves significant catchment modification, which will adversely impact on flooding, drainage and environmental health of the waterways. The project would significantly increase impervious areas, resulting in increased peak flows and volume of runoff from the road surface.

Council requests that any potential flooding, drainage and environmental health impacts should be assessed and addressed to ensure that the pre-road construction flooding regime is maintained or improved.

Flood impact assessment for all the design flood events including the 1%AEP and the PMF shall be submitted for Council's review and endorsement. The flood maps should include the following:

- Flood level contours and depths;
- Velocity vectors for both pre and post development conditions;
- Flood depth difference; and
- Velocity difference maps.

The flood maps shall ensure that no private property is adversely affected by flooding due to proposed road works.

Appropriate and adequate flood mitigation works including detention basins shall be incorporated to ensure flood levels, peak flows and velocities across the catchment area are controlled to existing conditions or improved.

### **Stormwater quality**

The proposed road upgrade would generate substantial amounts of solid and liquid pollutants. If appropriate mitigation measures are not implemented, it would significantly impact on water quality of the adjoining waterways.

It is noted that 50 temporary sediment basins will be constructed to control water quality during the construction phase. A number of roadside swales will also be constructed at locations where sensitive receiving waterways have been identified, to control water quality to an acceptable level during operation.

Council has met with RMS representatives and discussed the need for the following additional assessments:

- A detailed water quality modelling using MUSIC model should be undertaken to assess impact of the proposed road upgrade and to determine provision of water quality treatments, including gross pollutant traps (GPT), bio-swales and bio-retention basin. The design of water quality treatment should be designed to ensure pollution reduction targets are achieved in accordance with Liverpool City Council's Development Control Plan.
- Comprehensive on-site stormwater treatment facilities should be designed and constructed to ensure all gross pollutants, nutrients and liquid contaminants (including spill of fuels, oils, lubricants) are captured and removed from the stormwater runoff before entering into the natural waterways.
- A fail-safe emergency water quality management system shall be in place at all times.
- The maintenance of GPTs should be the responsibility of RMS

RMS has agreed that a technical workshop will be organised with Council representatives to discuss and address the above requirements in order to resolve the outstanding stormwater and drainage issues.

### **LGA Gateway Treatment**

The Northern Road links Camden, Liverpool and Penrith LGA's. The three Councils have various forms of entry statements to their respective LGA's. It is requested that gateway treatment is to be provided in consultation with the relevant Councils. Appropriate location and road spaces should also be identified in consultation with the relevant Councils.

### **Landscaping**

RMS should develop a landscaping plan for road verge areas in consultation with Council. Council will provide a list of approved plant species and plant density for road verge areas. For the appropriate of maintenance of verge area, the gradient of the verge shall not exceed 1:4.

### **Heritage Impacts**

Council notes that the project would have the following heritage impacts and appropriate treatments are to be implemented:

**Aboriginal Cultural Heritage** - Reports and photo archival has been undertaken for an Aboriginal Heritage Impact Permit (AHIP) and associated excavation salvage. Council requests a copy of this report for its records.

**Non-Indigenous Heritage Assessment** - Council is concerned that the report may not have addressed all the requirements of the NSW Heritage Division Guidelines, in particular, the assessment conditions and options analysis. In addition, the project will affect the following four sites:

**Lawson's Inn site** - This site is an identified as a heritage site under the Liverpool Local Environmental Plan (LLEP) 2008. The project would impact on the curtilage and not affect the archaeology. Council considers that the artefacts should remain insitu with the proposal designed around it.

**Miss Lawson's Guesthouse** - This site is not listed as a heritage item under the Liverpool Local Environmental Plan 2008. Council requests that prior to demolition, further detailed investigations should be undertaken to determine the extent of the remains.

**Lot 502 DP 580982 and Lot A, DP 160890** - The Environmental Impact Statement does not provide an appropriate assessment of these heritage sites nor substantive evidence that the archaeological relics cannot be preserved. Council requests that all buildings, objects or items to be removed or demolished are to be photographically archived in accordance with NSW Heritage Division guidelines and copies provided to Council.

### **Employment**

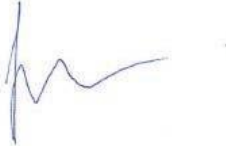
Council appreciates that this project could generate significant employment opportunities for local residents during construction and requests that local businesses be given the opportunity to tender for works and be part of this major project.

Council suggests that procurement workshop(s) be held inviting local businesses and interested contractors to attend. The ICN Gateway, or similar a platform, could also be a useful tool to engage with local business to ensure local content and opportunity is maximised on the project. In addition, consideration should be given to apprentices from the local TAFE colleges.

**Public Transport** - Council has been making representations for a rail link to be provided to the airport and considers that while the project include bus lanes, the ground transport plan should include an extension of the South West Link from Leppington to the Airport.

Should you require any further information on this matter, please contact my office on 9821 9221.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Kiersten Fishburn', with a stylized, flowing script.

**Kiersten Fishburn**  
Chief Executive Officer