COMMENTS ON
DIVISION 5.2 AND EPBC ACT APPROVAL
MODIFICATION ASSESSMENT REPORT
ON THE
ADAMS ROAD INTERSECTION
WITH
THE NORTHERN ROAD
December 2018

GENERAL COMMENTS

We remain opposed to the proposed modification to Adams Road and consider the feedback from RMS on the previously provided comments on this proposal to be inadequate.

INFORMATION PROVIDED IN THE REPORTS

The reports compare the proposed modification (intersection) to the previously approved plan (bridges). As such, there are minor/incremental changes mooted to noise etc compared to the previous plan throughout the reports.

However, no consideration is given to the fact that this proposed plan will have a large impact on residents/owners on Adams Road. Compared to the current situation (that is, 2 lane local Adams Road and 2 lane current Northern Road) the new 6 lane Northern Road and Adams Road intersection is detrimental compared to the previously proposed bridge. It will result in a huge increase in Adams Road traffic linking to the Northern Road.

PERIOD OF CONSULTATION

Notification emails regarding the reports were sent on 6 December and the period allowed for consultation and comment is only13 calendar days.

Such a short period of time for consultation/comment at this exceptionally busy time of year is totally unacceptable. It appears the information has been released at a time when affected residents will be unable to provide comments and true consultation will not be possible.

AFFECTED RESIDENTS

There seems to be no understanding that there is a distinction between “community” members’feedback to the proposed modification and “affected residents/property owners”.

People living on Adams Road will be significantly, negatively affected at all levels of the construction and operation of the modified Adams Road yet there appears to be little account of this in the whole process.

Residents most affected should have their views weighted when considered in comparison with people who do not live nearby and may only be a road user. Some of the Adams Road residents/property owners have had part/all of their land and/or homes compulsorily acquired, will have major disturbance during construction and will have to live with the consequent huge increase in traffic volume, noise, fumes and the diminution of their property in size and possibly value.

It appears this methodology does not takes into account the significant effect on affected residents.

While it is understood this process is to meet requirements for and defend RMS' preferred option, it does not go any way to addressing the concerns raised in the previous consultation about the modifications to Adams Road.

REAL REASON FOR MODIFICATIONS

The real reason for the modifications is cost reduction (see page 26 Modification Assessment Report), rather than, or in spite of, what is for the benefit of affected residents or the greater Luddenham community.

CONSULTATION REPORT

The Consultation Report provides an outline of the process involved in "consulting" related to the modified plans proposed for Adams Road. The report lists the activities undertaken and defends RMS plans.

However, while there have been a number of activities/processes involved in advising of RMS modifications, a consultation process should genuinely seek to include residents in the decision-making process, taking note of their concerns/suggestions by amending plans to deal with these in a way which is acceptable and desirable to them. It would be more truthful to call these processes "Information/Advice" rather than "Consultation".

Throughout the Luddenham phase of The Northern Road project, there have been occasional minor concessions but there has been no real intention to do anything other than promote the RMS' preferred option or plans through to completion. Hence these processes would be more appropriately called Information processes.

The report does not adequately address the issues raised by those living on Adams Road or the local community who oppose this major change.

The Report

Page 9 Options Report: Previously advised concerns about the Options Report methodology were that it centred on what is the best road outcome, not what is best for residents of Adams Road and other local residents.

The Consultation Report merely re-states that the analysis is "a requirement of the development approval process" and that there has been consistency in the weightings for this and other sections of the road.

It does not address the need to give a greater weighting/consideration to affected residents given they have to live with the results 24 hours per day or what and how to assist residents (rather than, for example, road users or business owners).

Most good analysis includes a Triple Bottom Line approach, namely the economic, social and environmental issues. Using a road-centric approach or methodology, focused on road users and road journey effectiveness rather than a social/resident-focused approach on both sections of road merely gives the same road-centric outcomes and avoids identifying or dealing with the resident or people impacts and issues.

It doesn't make the methodology any better the more it is used, or however many times it is re-stated in the document.

Page 10 Noise and Vibration: While it is heartening to know some architectural noise mitigation measures will be installed for some residents, this is not widespread and does not include residents closer to the current Adams Rd and Northern Road intersection, despite the trebling in vehicle volume.

Air Quality: The report states there are no additional receivers affected over the NSW EP A criteria thresholds for vehicle emissions. Given there will be a minimum of triple the vehicles on Adams Road (from 1500 to at least 4500 as advised by RMS) it is clear there will be an increase in emissions.

Regardless of whether there are additional residences affected, or there is/isn't increased braking at the intersection, Adams Road properties and residents will experience increased emissions because of the huge increase in traffic volume. What is the proposed mitigation response?

Adams Road Usage: The report states that Adams Road is a local road (page 50) the intended access route to Luddenham town centre is via Elizabeth Drive and The Northern Road. However, it is contradicted two points later, stating "*The forecast increased traffic numbers along Adams Road primarily relate to a redirection of traffic from The Northern Road to Adams Road as it provides a link to Elizabeth Drive …. The Adams Road connection will allow increased use of Adams Road to access Luddenham."*

Clearly Adams Road will be used much more than currently.

Many vehicles will access Luddenham from Adams Road. Additionally, any traffic snarls or accidents will also push vehicles onto Adams Road. Installing a large intersection with lights will guarantee Adams Road becomes more highly used as a major thoroughfare, as RMS' own data of projected road usage shows. Once the airport is in place Adams Road usage will further increase beyond the RMS projections. This will be as a result of growth in the area.

Allowing vehicles to re-join The Northern Road from Adams Road will mean that Adams Road west (up to the current intersection with The Northern Road) will become a virtual on/off ramp to access the Shell Service Station and shops, which will mean a huge increase in traffic numbers and noise.

What are the traffic calming measures on Adams Road and when will these be installed? What is the timing for the point at which "mitigation is required"? These measures should be installed to be concurrent with the opening of the realigned Northern Road stage 5 and 6.

Truck Usage: In response to concerns that trucks will use Adams Road, the report states that the 3 tonne limit on the road is not proposed to change.

Signage alone is not an adequate response, as this is ignored now.

Clearly the report authors have not spent much time on Adams Road. Many trucks over the 3 tonne limit currently use Adams Road at all times of the day. Naturally, those residents undertaking primary production activities need to access their rural properties, especially those which require

livestock, feed or equipment movements. However, what will RMS do to ensure large non-local trucks do not use the road as a thoroughfare?

Page 11 Safety of Access to Adams Road by Residents from their Properties: Working with some property owners on their driveway access does not address the problem of other Adams Road residents attempting to enter or leave their homes with at least three times the number of vehicles using the road, or parents attempting to turn into or leave Jamsion Road on school days.

What mitigation will RMS put in place to assist residents to safely enter and leave their Adams Road homes, or parents turning from or to Jamison Road to access the Public School?

MODIFICATION ASSESSMENT REPORT

Executive Summary, page 2
"*...An increase in traffic volumes along Adams Road (to about 700 vehicles per hour), which would exceed the Guide to Traffic Generating Developments (Road and Traffic Authority, 2012) guidelines for environmental capacity limit of a local road (300 vehicles per hour). Measures to mitigate this increase in forecast traffic volumes on Adams Road would be developed in consultation with the local Council.*"

The Consultation Report states there will be relatively low existing and forecast traffic; yet this report shows the traffic volumes will increase in excess of the RTA guidelines for a limit of a local road to 1 car every 5 seconds (700 cars per hour).

This shows the Consultation Report responses to local concerns is dismissive and resident's concerns are correct. If RMS forges on with this modification regardless of affected resident's concerns, then practical traffic calming and other measures are essential to ensure safety of residents, pedestrians and road users.

Project Objectives, page 10
The third of three objectives is:
"*Customer focus – provide meaningful engagement with customers and stakeholders throughout the program life.*"

What is "meaningful engagement" in the context of this disruptive and totally life-changing construction? What is RMS and the NSW Government doing to ensure affected residents/property owners best interests are being addressed?

2.21 Main Features of the Proposed Modification, page 13
"*This would allow access between The Northern Road and Adams Road without the need to travel through Luddenham town centre, and access to the Luddenham town centre from Adams Road intersection.* "

This contradicts the Consultation Report about The Northern Road and Elizabeth Drive routes being considered the main routes for access to the Luddenham village, with no real impact on Adams Road. Clearly this report shows the reality of the effects, whereas the answers to feedback on Option 1 are meant to gloss over the concerns of affected residents.

2.25 Earthworks, page 14
"*The proposed modification would require a larger volume of cut than considered in the SPIR and Final EIS. This is due to the regrading of Adams Road to the west of The Northern Road alignment, which requires excavation to the level of the proposed intersection with The Northern Road."*

Residents of Adams Road from the new intersection alignment to the old Northern Road have not been consulted, advised or informed of the effects to their properties of excavation to the level of the proposed intersection.

2.27 Traffic Management and Access, page 15
"*The section of Adams Road between the existing The Northern Road in Luddenham and the new project alignment was also identified as a haulage route. The rest of Adams Road would not be used for construction traffic access."*

What mitigation arrangements will be made for the residents on the affected "haulage route" during the construction phase. No information has been directly communicated to those of us affected by these arrangements. A letter advising of the changes is inadequate.

2.4 Increased Project Boundary, page 16
"*Proposed Changes to the project….An increased construction and operational footprint around Adams Road to enable the regrading of this road."*

What does this mean in reality for the residents of Adams Road, especially those whose residences are closest to road (from the current Adams Rd/Northern Road intersection to the bottom of the hill) during the construction? No information has been directly communicated to those of us affected by these arrangements.

2.5 Need, page 26
"*The Value Engineering Study identified the need for a number of design changes to reduce the costs associated with the project."*

While it is understood governments should seek value for money, this seems to have over-ruled resident impacts. The only reference to resident impacts or view is is in Table 2-3 to the "community and stakeholder consultation requirements" (not the community's views or needs) and "RMS' reputation with the community".

2.6.2 Analysis of Options, page 27

"*While there was no specific consultation with the community about a preferred option for the intersection, the options analysis considered likely community concerns based on previous engagement throughout the development of the EIS."*

- Why was there no consultation with affected residents, apart from the reason of keeping within RMS project time frames?
- What were the "likely community concerns" considered?
- Did the analysis at any time consider the huge impact on residents on Adams Road, property owners via the increased noise, traffic movements, effectively making Adams Rd an on/off ramp and a "rat run"?
- What mitigation features were considered?

- What provision was made for changing the option in the face of affected resident and community views or misapportionment of ratings?

Table 2-4 Summary of Adams Road Intersection Options Assessment, pages 27-28
Why was the community preference assumed to be with option 1, the RMS preferred option, when no consultation undertaken with affected residents.

Why was community preference only weighted at 4% when business preferences were weighted the same? Residents actually have to live with the changes 24 hours a day.

If you take out the RMS' presumptive weighting of community preference for option 1, option 3 is preferred with option 2 also equalling option 1.

RMS should reconsider the assumptions for these options based on the misconceptions regarding community preference. The assumption that the "community" would prefer this option is either totally misplaced or is focusing only on the interests of road users or businesses.

4.1 Consultation Strategy, page 35
This section clearly states the process has been largely a "communication plan", rather than a meaningful consultation with affected residents.

There is limited opportunity for affected residents/property owners to be able to communicate views in advance of RMS decisions and the weighting their views are given underestimates the huge impact on their daily lives.

4.4 Response to Feedback Received, pages 37-40
See also comments above on Consultation Report.

4.7 Future Consultation, page 41
"*Roads and Maritime will respond to those who submitted comments to the proposal. The Department will make a decision on whether further consultation is required, or to approve the modification. Should further consultation be required, Roads and Maritime would consider issues raised during this consultation."*

It would be helpful if RMS engaged with affected residents and took concerns regarding the effects of the modification on them seriously, by amending or changing plans in favour of affected resident concerns, rather than pushing modification options through, regardless of the impacts.

How will RMS respond to people who provided comments on the proposal and in what form? If it is merely to communicate RMS' intentions rather than seriously engage with our concerns and show willingness to change, then it will not have been a true consultation process, merely an information process.

5. Environmental Assessment and Mitigation Measures, page 42
Table 5.1
"*This new route will result in changes to traffic flow along Adams Rd"*

Elsewhere, in the Consultation Report, it appears this fact is minimised.

Urban Design and Visual Impact, Page 45
The introduction of high embankments and increased road infrastructure on Adams Road results in locally increased landscape character and visual impact.

Affected residents on Adams Road have not been advised of these impacts will be, although it appears some land owners, closest to the proposed intersection, have been made aware of the need for more of their land to be acquired, dams filled or noise mitigation installed.

Air Quality, Page 48
"*Sensitive receivers near the proposed intersection at Adams Road have the potential to experience a minor increase in air quality impact during construction.*

During operation, the introduction of the signalised intersection would change traffic conditions along The Northern Road and Adams Road as vehicles would be stopping and starting, and decelerating and accelerating accordingly. The effect of these changes will typically result in increased emissions to air due to congested traffic conditions. The forecast increased volume of traffic along Adams Road is considered to cause negligible air emissions.

The emission factors (i.e. intensity of emissions from different vehicles) would be in the order of 1.5 times higher (on average for PM, CO and NOx) for the traffic conditions modelled for the proposed modification relative to the EIS."

Given the major increase in traffic to at least 4,500 vehicles per day on Adams Road (triple current usage) and 6 lanes of vehicles on the new Northern Road, as opposed to the current 2 lanes. it is unclear how there will be only "negligible air emissions" to affected residents, when the emission factors wold be 1.5 times higher.

The new design is effectively an enclosed pincer shape of the two roads and those enclosed by, or adjacent to, the new Northern Road and/or on Adams Road will be subject to and surrounded by increased emissions and emission factors.

As such the impact on air quality should show the measurements, not only for the modified option, but compared to the to the base/current levels for Adams Road without the newly aligned 6 lane Northern Road and the increased vehicle numbers on Adams Road. This would show the full impact on affected residents, rather than the difference in the modified plan and the original plan.

Traffic Volumes, page 52

The intersection..*allows vehicles to use Adams Road to avoid the intersection of Elizabeth Drive and The Northern Road to travel to and from Luddenham in the west and Elizabeth Drive to the south. This would also reduce traffic volumes on The Northern Road between Elizabeth Drive and Adams Road in the northbound direction but increase volumes in the southbound direction.*

This new route would increase traffic volumes along Adams Road by up to 700 vehicles per hour in the peak period, to avoid travelling via the intersection of Elizabeth Drive and The Northern Road. This increase is above the environmental capacity limit for a local road of 300 vehicles per hour (RTA Guide to Traffic Generating Developments, 2012). The RTA guideline specifies suitable traffic volumes from a road network hierarchy perspective to meet acceptable environmental (amenity) outcomes for the local area. Potential mitigation measures for this impact are outlined in

Section 5.2.4."

As per previous comments, the increase in traffic volume along Adams Road will negatively affect residents in terms of noise, emissions, safe entry and exit from their properties.

The proposal to consult with the local Council on the mitigation measure for Adams Road is a manifestly insufficient response.

Should this modification to Adams Road proceed, mitigation measures for traffic volume, tare weight restrictions, noise, calming and safety needs to be undertaken and completed at the same time as the proposed Adams Road intersection is open to traffic.

Road safety page 54-55
"The increase in traffic volumes on Adams Road has the potential for adverse impact on road safety as increased traffic volumes increase the risk of collisions between vehicles and pedestrians along this road. The increased risk is small and is generally acceptable, however it will nonetheless be a greater residual risk than if the volumes were lower."

What is the level of increased "..risk of collisions between vehicles and pedestrians along this road", injuries or deaths does the RMS and the NSW Government find acceptable?
The increased volume of cars on Adams Road (up to 800-1200% more than current numbers) will be a huge risk to pedestrians and other local traffic. Cars travelling in excess of the 70km per hour speed limit already pose a threat to any pedestrian or local resident vehicles attempting to enter or exit their driveways on Adams Road.

The volume of traffic under this proposal will only increase the dangers.

"The additional mitigation measures proposed to mitigate the impact of the proposed modification on Adams Road is consultation with the local Council to develop measures to dissuade vehicles from using Adams Road and therefore mitigate the increase in forecast traffic volumes on Adams Road. For example, suggested measures could include reducing the speed limit on Adams Road, introducing load limits, or introducing local area traffic management such as speed humps or other traffic calming devices.

We agree that lower speed limits, significant traffic calming devices and reduction in non-local heavy vehicles are required now. These measures will need to be strengthened even more with this proposed modification.

These should be **in place** and functional as part of the construction of The Northern Road realignment and the proposed intersection with Adams Road from the same time The Northern Road is operational. It should not be left to the local Council (Liverpool) as our experience over the past decades has been that we receive little in the way of road repairs and other services, being on the extreme boundary of the local Council area.

Traffic Noise Page 55

Traffic count surveys have been conducted along Adams Road to establish the level of background noise due to this traffic and to support the noise assessment for this proposed modification.
As described in the SPIR and Final EIS, the noise environment would be affected by the construction of the approved project, and during operation of the new The Northern Road alignment.

What will be done to mitigate the noise of operation of the modified Adams Road for affected residents, over and above the 26 “receivers” identified in the report?

Maximum Noise Levels, page 57
“..one extra event per night would be generated with the potential to cause sleep disturbance events near the Adams Road interchange. The area affected by these potential sleep disturbance events is also small, extending up to 160 metres from the new intersection along the main alignment.”

On Adams Road at night we can hear trucks braking and traffic on The Northern Road up to Elizabeth Drive and beyond the southern exit of Eaton Road. Given the increased number of lanes to 6 (from the current 2 on the old Northern Road), the increase in traffic on Adams Road and greater connectivity to the motorways, the claim of one extra noise even per night for this modified design is highly questionable.

We understand this assessment is based on the comparison between the original design and the proposed modified design. However, the overall noise effect on Adams Road residents will be huge from this modified project, especially in comparison to current traffic levels. This is because of the huge increase in volume on Adams Road under the proposed modification combined with the newly aligned Northern Road and the intersection between the two.

Signalised Pedestrian Tonal Beepers, page 57
“*The noise model indicated that no receivers experience noise emissions over 40 dB due to the traffic signals at the intersection. Therefore, the potential for sleep disturbance events is negligible.”*

The beepers emit a constant noise which will be annoying to people living nearby on Adams Road, regardless of the time of day.

Summary of Biodiversity, Page 64
“..overall conclusion has been made that the modification is likely to result in a minor effect on biodiversity values”
We note that tree root balls and timber is meant to be retained and re-used wherever possible in the re-vegetating of the road sites.

If the work already undertaken on The Northern Road between Oran Park and Bringelly is anything to go by, this has been interpreted as mass removal of trees and wood-chipping, rather than any retention for re-use.