

4 November 2020



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Dear DPIE

**RE: Opposition against M12 Amendment Report - Wallgrove Rd and Cecil Road intersections**

The Cecil Park Resident Action Group (CPRAG) represents over 150 members. The CPRAG strongly opposes the amended design of the M12, particularly the proposed realignment of Wallgrove Rd onto Cecil Rd.

**Frustration over M12 route changes – ignoring public consultation**

**2016:** The CPRAG were significantly involved in the community consultation regarding the proposed route of the M12. The CPRAG were pleased that their concerns had been addressed when the proposed corridor was announced in November 2016. Notably, the proposed intersection of the M12 and M7 occurred on inaccessible parts of Western Sydney Parklands and away from private property owners. The initial recommended route can be seen in Annexure A.

**2018:** The CPRAG were extremely disappointed when despite significant public consultation, RMS changed the route as shown in Annexure B. Members felt as if the consultation had been a hoax and as if their interests had been completely ignored.

**2019:** RMS updates plan with intersection largely occurring where Wallgrove Rd and Elizabeth Drive currently intersect as seen in Annexure C.

**2020:** The CPRAG are extremely shocked and angered to learn that the RMS is proposing to reroute Wallgrove Rd onto Cecil Rd and then direct all traffic onto Elizabeth Drive. This proposal completely ignores the responses of the community consultation in 2016 and further raises a number of concerns which will be detailed in this letter.

## **Lack of Procedural Fairness**

It is extremely disappointing that residents who will be affected by the realignment of Wallgrove Rd onto Cecil Rd were not officially notified by RMS on this change and of the exhibition period. In 2016 we were able to produce a petition from over 150 property owners and residents whom supported our previous submissions. In relation to this most recent change, a community consultation was only held on Facebook without any reasonable notice. Many of the affected residents are elderly and were not afforded notice or other avenues to engage.

A 14 day exhibition period is extremely limiting and has prohibited the CPRAG from obtaining legal advice, environment reports, planning reports and traffic reports in response to those submitted with the amended design.

Should the proposed Wallgrove Rd realignment onto Cecil Rd proceed, the CPRAG will consider injunctive relief to prevent progress on this basis.

## **Concerns of the proposed Wallgrove Rd and Cecil Rd intersections**

The rerouting of Wallgrove Rd onto Cecil Rd raises a number of concerns. The CPRAG opposes this intersection on the following grounds.

### **1. Increased Traffic – Combining Cecil Rd and Wallgrove Rd**

The current intersection at Wallgrove Rd and Elizabeth Drive is a major intersection. Both roads are used as routes for heavy vehicles. This is unlikely to change as a result of the M12 construction.

Currently there are major delays on Wallgrove Rd turning left onto Elizabeth Drive during peak periods and additionally delays on Cecil Rd turning left on Elizabeth Drive. Combining the traffic from Wallgrove Rd and Cecil Rd will cause major delays on both Wallgrove Rd, Elizabeth Drive and Cecil Rd. These have not been accounted for in the design.

The traffic report is inadequate as it does not model the impact of the Wallgrove Rd and Cecil Rd intersection. Further, the traffic report does not clearly detail the effects of redirecting the traffic from Wallgrove Rd onto Cecil Rd and then onto Elizabeth Drive. A separate report should be commissioned that clearly addresses these concerns and different alternate connections models.

While the report does not adequately address the aforementioned traffic concerns, it does note that:

*The assessment also identified a decreased level of intersection performance at Elizabeth Drive / Cecil Road .....Increases in delays at these intersections are a result of the addition of construction-related heavy vehicle traffic. Additional delays would be experienced for vehicles waiting for a gap in traffic when turning right or left. Due to their length, construction-related heavy vehicles require longer gaps in traffic to safely turn from minor roads at priority-controlled intersections.*

## **2. Noise Pollution**

The rerouting of Wallgrove Rd onto Cecil Rd will cause significant noise pollution for the residents and land owners of Cecil Park. This was a major concern when the M12 consultation occurred in 2016. The diagram below shows that the rerouting of Wallgrove Rd (a heavy vehicle road) away from the current Elizabeth Drive intersection will cause a major extension of the range and severity of noise pollution in Cecil Park. Noise pollution would be significantly minimised if the RMS did not amend the current design.

As an adequate traffic report has not been provided which calculates the delay at the proposed Wallgrove Rd and Cecil Rd intersection, we suspect that the noise pollution would be worse than indicated in this diagram, as the true amount of delay has not been accounted.



### 3. Environment Pollution – Destruction of creek

Wallgrove Road will be constructed on top of a natural creek as shown in the image below. This creek (although not detailed in the map) extends further into Cecil Park. The creek naturally collects run-off and is used to provide a vegetation buffer from the traffic on Wallgrove Rd, the M7 and Elizabeth Drive. Additionally given the large amount of agricultural production by farms in Cecil Park, many are concerned that the run-off from the rerouted Wallgrove Rd will affect water quality and contaminate dams that link up with this creek. These concerns have not been adequately addressed in the Environmental Report.



### 4. Unclear rationale for the Wallgrove Rd and Cecil Rd intersection

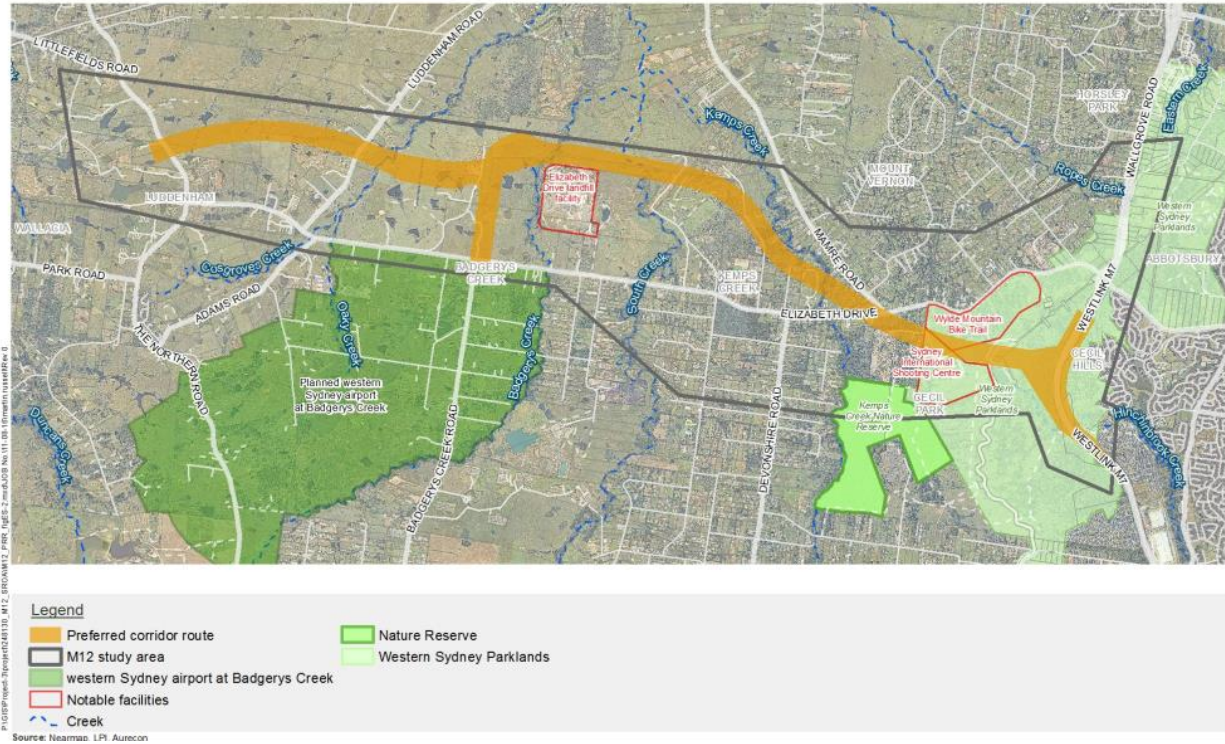
Traffic, Noise and Environmental Pollution are the major concerns of the CPRAG, which believes that intersection should remain as exhibited in 2019.

The rationale for the most recent amendments are unclear and have no planning merits. It appears this amendment is to accommodate the State Significant Application regarding the Elizabeth Drive Subdivision SSD-8859 at 1111-1141 Elizabeth Drive Cecil Park SYDNEY NSW 2178. This rationale should be investigated by the Department further.

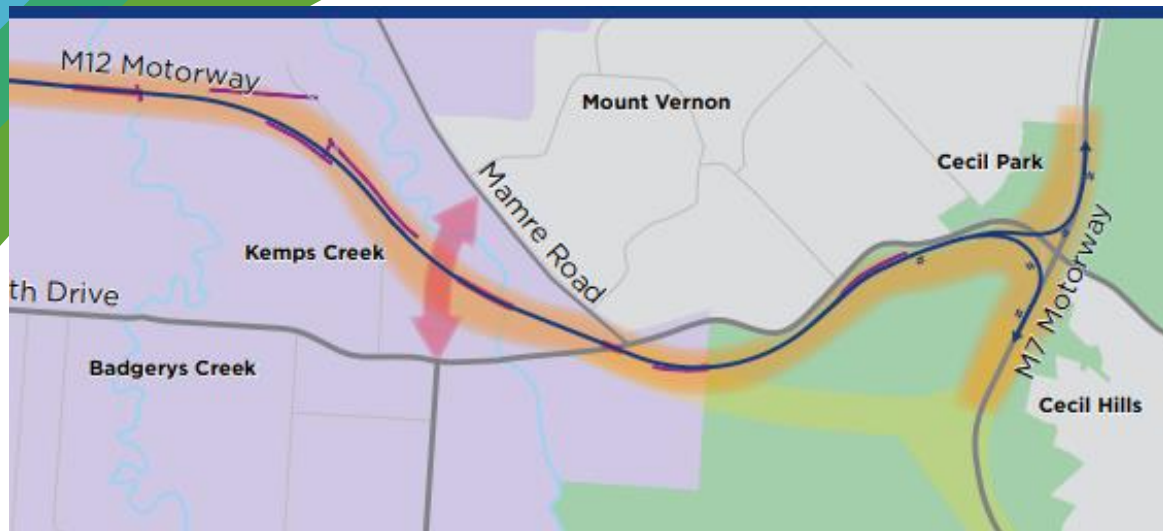
Warm regards



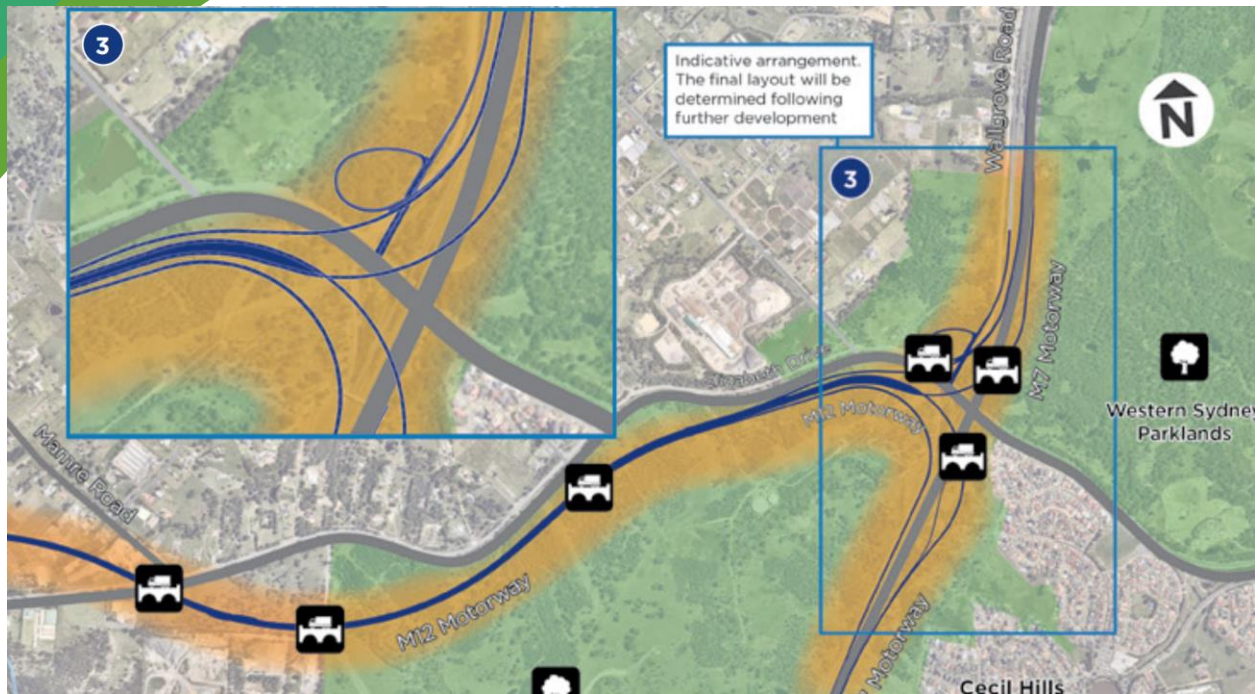
## Annexure A – Preferred M12 Corridor after community consultation – November 2016



**Annexure B – Updated corridor in 2018 ignoring public consultation**



**Annexure C – Updated corridor in July 2019 with intersection of Wallgrove Rd and Elizabeth Drive remaining.**



**Annexure D - Current amended proposal rerouting of Wallgrove Rd onto Cecil Rd than back onto Elizabeth Drive**

