

**In reply please quote:** 19/29449  
**Your reference:** SSI-9364

**Contact:** Andrew Mooney 9725 0214

16 November 2020

Transport Assessments  
Department of Planning, Industry and Environment  
4 Parramatta Square  
PARRAMATTA 2150

Attention: Lauren Rose

## **M12 ENVIRONMENTAL IMPACT STATEMENT (EIS) – MAJOR INFRASTRUCTURE PROJECT**

Council at its meeting of the 10 November 2020 endorsed the matters outlined in this letter, as the basis for a submission to the M12 EIS Submissions and Amendment Reports.

### **Executive Summary**

The above reports propose a range of amendments, that in Fairfield City includes a major (western) realignment of Wallgrove Rd onto Cecil Rd and provision of a 2 lane roundabout at the intersection between Wallgrove Drive and Cecil Rd at Cecil Park, as well as the following critical options;

#### **Option 1 – Without Elizabeth Drive connection**

- Interchange provides entry and exit ramps between the M12 Motorway and the M7 Motorway; in addition, it would maintain the existing connection of the M7 Motorway to Elizabeth Drive with new entry and exit ramp.

#### **Option 2 – With Elizabeth Drive connection**

- Interchange as per option 1 and also provides entry and exit ramps between the M12 Motorway and Elizabeth Drive, Cecil Road and Wallgrove Road. The decision on which option would be built is dependent on funding being available to include the Elizabeth Drive connection. This would be defined during the detailed design phase of the project and prior to the award of the construction contract.

The amended EIS states that if Option 1 is progressed due to funding limitations, the M12 Motorway may be accessed via The Northern Road to the west and the M7 Motorway to the east.

In addition to the above, the previous designs for the M12 (as exhibited), did not include signalisation of Elizabeth Dr/Cecil Rd and proposed to restrict access to/from Cecil Rd to left in/left out only.

Council acknowledges that under both Options 1 & 2 (above) the intersection of Elizabeth Drive and Cecil Rd will be fully signalised to allow the full range of eastern and western traffic movements through the signalised intersection.

In this regard, the amended designs (incorporating Option 2) address key traffic planning/management issues raised in Council's submission to the EIS. This is particularly in regard addressing long term, cumulative traffic impacts for the district and regional road networks.

This includes improving vehicular access to/from areas of the Fairfield Urban Investigation Area (UIA) in Cecil Park to Elizabeth Dr, M12 and M7 as well as improving the connections in general to the Western Sydney Airport WSA at Badgerys Creek.

Under both Options 1 and 2 Council strongly recommends that TfNSW undertake further investigations and analysis of the proposed new roundabout at the intersection of Wallgrove Rd and Cecil Rd and new signalised intersection of Cecil Rd and Elizabeth Drive. Under the current amended design there would appear to insufficient distance between the two intersections to allow for queuing of traffic that could undermine the performance and traffic safety levels of the intersections and associated road network.

As detailed further below, Council requests further investigations and to be updated in relation to a range of traffic management/planning issues as well as biodiversity, flooding and acoustic impacts associated with the revised M12 Project.

### **Submission issues**

#### **Fairfield City Council's recommended Option for M12/M7 Interchange:**

Council endorses Option 2 (above) as this provides the greatest scope for road network improvements to the broader community of the Western City by providing a toll free option (via the M12) to the Western Sydney Airport at Badgerys Creek.

Option 2 would also represent a far superior option in terms of the concerns raised by Council in regard to longer term strategic traffic planning and management issues in proximity of the M12/M7 Interchange as follows:

- The design supports the role of Cecil Rd as a primary southern access Rd to the UIA as per the draft Structure Plan endorsed by Council in April 2019.
- The changes also support the potential for establishing a future town centre (supported by rails station) that has direct access to the M12 (including direct motorway access to the WSA), as well as maintaining northbound access onto the M7.

This is an important strategic land use outcome the adjoining Western Sydney Aerotropolis area, which is constrained to some degree in the total amount of future residential development that can be accommodated in the Aerotropolis.

This is due to a range of considerations/constraints relating to airport safeguarding measures as well as the priority given to other competing land uses that support employment generation opportunities closer into the airport.

- The signalisation of the intersection of Cecil Rd and Elizabeth Dr, as well as the straightening and reduction in the grade of Elizabeth Drive between Duff and Cecil Rds, will enhance traffic safety along Elizabeth Drive.

#### Traffic management and planning issues

Both Options 1 and 2 as well as the realignment of Wallgrove Rd give rise to a range of new traffic management and planning considerations that Council requests be given further attention to under further stages of the M12 Project:

- While Option 2 is preferred, what is not clear is the expected diversion of traffic onto the local road network with this option i.e. proceeding straight onto Cecil Road instead of turning right into Wallgrove Rd.
- The traffic model needs to be amended to assess the impact on the local road and what actions need to occur to address these impacts with the advent of the M12 (the traffic model was not amended to accurately reflect the Wallgrove Road deviation across to Cecil Road).
- Council suggests that the road corridor needs to be sized now to accommodate future upgrade to traffic control signals at the new Cecil Road/Wallgrove Road intersection i.e. land acquired as part of the project for 4 lanes plus turn bay/bus priority/cycle infrastructure.
- Under Option 2, the creation of ramps between the M12 Motorway and Elizabeth Drive, Cecil Road and Wallgrove Road is considered a baseline requirement i.e. not dependent on additional funding.
- Alternatively, the whole of Elizabeth Drive should be upgraded from the Hume Highway to the new airport on the same time line as the M12 to address the traffic impacts of not having the interchange. The proposed widening of the M7 Motorway should also be brought forward to address increased levels in demand for vehicular access to the airport.

#### Biodiversity Issues

The proposed western re-alignment of Wallgrove Rd will impact on additional areas of Cumberland Plain Woodland with high conservation values between Wallgrove Rd and Cecil Rd. The updated Biodiversity report indicates this includes habitat for threatened flora and fauna where live Cumberland Plain Land Snail was found in ecological surveys of the area.

It is noted that the TfNSW response to submission indicates that these and other impacts on biodiversity resulting from the project will be investigated further during detailed design, pre-construction and construction phases of the project.

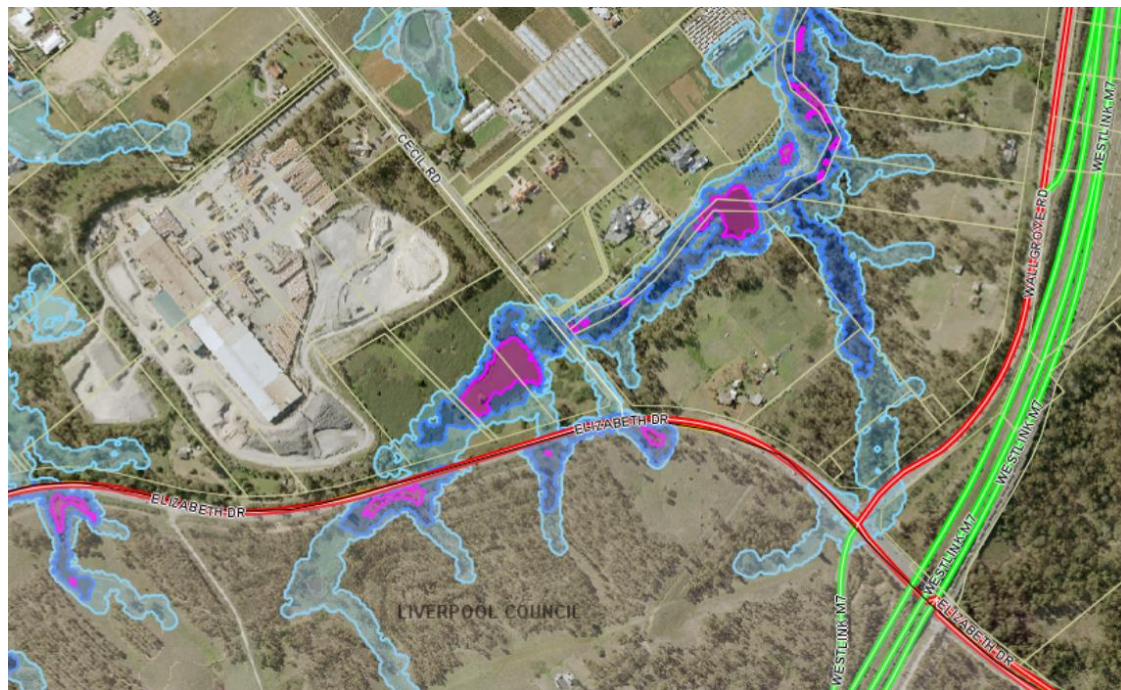
It is acknowledged that the assessment of biodiversity impacts and proposed offsetting measures require more detailed investigations under further stages of the project. This work will need to be carried out in accordance with relevant State and Federal legislation.

It is also requested that Council be consulted in relation to measures to offset biodiversity impacts in the Fairfield LGA and include further consultation with Council.

### Flooding Impacts

The proposed western re-alignment of Wallgrove Rd also impacts on tributary to Ropes Creek as well as an existing artificial wetland (farm dam). The technical studies associated with the amended proposal do not clarify the extent of impacts on stormwater management and flooding issues in this area.

However, the following image taken from Council's land information system shows the extent of flooding impacts along this tributary from its western extent across to the current alignment of Wallgrove Rd.



- High Risk Precinct
- Medium Risk Precinct
- Low Risk Precinct

Based on the above, Council requests that TfNSW undertake further investigations into the impacts of the realignment of Wallgrove Rd on flooding issues, both upstream and downstream of the location.

This includes consideration of culverts or viaduct structures along the realigned section of Wallgrove Rd to mitigate flooding impacts and maintain the function of the Ropes Creek tributary as a natural watercourse.

Traffic Noise Impacts on Cecil Park

TfNSW response to submissions indicates more detailed investigations are required to assess the extent of noise impacts on areas of Cecil Park in proximity to the M12 as well as measures to mitigate these impacts (e.g. noise walls, vegetation buffers).

The proposed realignment and straightening of Elizabeth Drive between Duff Rd and Cecil Rds, will push the corridor into the Western Sydney Parklands, south of its current alignment further away from the UIA area in Cecil Park.

The grade of the Elizabeth Drive road corridor will also be significantly reduced and contained in a section as a result of additional 'cut' through sections of the sloping terrain in this area. It is anticipated that these design changes will help contain and buffer traffic noise impacts along this section of Elizabeth Drive in proximity to Cecil Park directly to the north.

Council requests that conditions of consent require TfNSW to keep Council updated in relation to measures to mitigate acoustics impacts of both the M12 corridor and widening/realignment of Elizabeth Drive on adjoining areas of Cecil Park.

Council appreciates the opportunity to comment further on the EIS M12 Major Infrastructure Project and please contact the undersigned if you have any further enquiries in relation to the issues raised in this submission.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Mooney', with a stylized, cursive script.

Andrew Mooney

**ACTING MANAGER STRATEGIC LAND USE PLANNING**