

8 June 2011

Director of Infrastructure projects
Department of Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Dear Sir/Madam,

M5 West Widening Project- Submission on the Preferred Project Report

Thank you for providing Bankstown City Council the opportunity to comment on the proposed expansion of the M5 West Motorway and the Preferred Project Report.

Council notes that a number of issues raised on the Environmental Assessment of the proposal have not been appropriately addressed on the recently submitted Preferred Project Report.

The Department of Planning and Infrastructure must address the following concerns prior to determining the Part 3A application.

1. Relationship with the entire M5 Corridor - Council seeks the Department of Planning to assess the impact of the M5 West Motorway application in the context of the entire M5 Motorway Corridor, and particularly the need to seek a firm timing commitment for a completion of the M5 East.

2. Congestion on regional roads linked to the M5 West – Council wants to bring this matter to the Department's attention that the traffic modelling of the proposal shows that the proposed M5 West widening simply redistributes the traffic delay from the western end of the M5 South West Motorway to the eastern end (i.e. towards Bankstown and Hurstville) without achieving an overall saving in travel times. This has additional disadvantages to Council as the east bound travel time between Henry Lawson Drive- The River Road- Fairford Road- Belmore Road and King Georges Road would increase, making the traffic in the surrounding road network including Stacey Street and King Georges Road even worse due to additional queuing from the eastbound on ramp to the motorway.

Council seeks the current application to address the more serious bottlenecks at connecting Metropolitan roads through the construction of a grade separation at the intersection of Stacey Street and the Hume Highway, and the widening of Stacey Street between the Hume Highway and Macauley Avenue.

3. Congestion to the Milperra-Bankstown Airport Specialised Centre - Council seeks the current application to investigate the provision of direct

on/off ramps to the Specialised Centre, e.g. at the Beaconsfield Street overpass, that will allow direct freight movements, and investigate the expansion of Henry Lawson Drive, in light of the anticipated future growth in the Specialised Centre.

4. Outstanding issues from the previous M5 construction works- The Department must seek commitment from the proponent to liaise with Council for a preparation of a Landscape Plan to enhance a gateway character of Fairford Road intersection prior to the approval of the project.

5. Environmental impacts resulting from the proposed works- The Department must require the proponent to amend the 'Revised Statement of Commitments' to seek commitments towards protecting trees and mitigating of stormwater discharge impacts from detention basins.

6. Noise impacts resulting from Construction and vibration, works proposed at Depots and Operation of M5 - Council is concerned that the *Revised Statement of Commitments* does not correspond to quantifiable measures to monitor noise impacts of the proposal since the *EA* and/or the *Preferred Project Report* does not provide a measurable noise mitigation program.

As indicated in the Preferred Project Report, a large number of residential properties and sensitive land uses are being affected by the construction and operational noise of the proposal. Council proposes that prior to the approval of the application, Construction and Operational Noise Management Plans be prepared in consultation with Council and affected properties to address and manage the noise impacts of the proposal.

As part of the submission, Council has outlined the issues in greater detail in Attachment A.

If you have any questions relating to this submission, I can be contacted on 9707 9606.

Yours faithfully,



James Carey
Manager, Sustainable Development

Enc. Attachment A - Bankstown City Council's Issues and Concerns on the Preferred Project Report

Attachment A

Issues and Concerns

In considering the Preferred Project Report of M5 West Widening Project, Council raises the following issues and concerns that the Department of Planning must address prior to determining the Part 3A application.

1. An integrated approach and commitment for the Entire M5 Corridor

Council reiterates that without an integrated solution for the entire M5 Corridor, the resulting congestion and inefficient transport networks will not only cost the State economically, but also cost its communities any improvement in quality of life and positive environmental outcomes.

Council recommends the Department assess the proposed application in the context of the entire M5 Motorway Corridor and seek:

- a firm timing commitment from the proponent for coordinated expansion of the entire M5 Corridor; and
- a commitment to wider freight and public transport strategies to complement the M5 expansion; and
- a firm Commonwealth funding commitment due to the importance of the M5 Corridor to the national economy.

A firm timing commitment for coordinated expansion of the entire M5 Corridor

In 2012, the capacity of Port Botany terminal would increase from 1.8 to 3.2 million containers a year. And yet rail only carries around 18 per cent of containers from the port. This leaves over 80% of this container traffic to use the M5 Road Corridor to access regional, intra and interstate connections effectively making the M5 Corridor the core of the current transportation network.

Funded under the Australian Government's Nation Building Program, work on the Port Botany rail yards and the Enfield yard staging capacity are coming to completion. The Metropolitan Freight Network, which connects Port Botany to the Chullora and Enfield Intermodal and the Southern Sydney Freight Line are all being increased in efficiency.

Although, the M5 west widening and the work on the rail networks have defined timelines, the same cannot be said for the expansion of the entire M5 Corridor. The traffic modelling of the M5 west widening shows that at the moment it simply redistributes delay from the western end of the M5 South West Motorway to the eastern end, without any substantial saving on travel time. It is essential that a firm timing commitment is sought for coordinated expansion of the entire M5 Corridor.

A commitment to wider freight and public transport strategies to complement the M5 expansion

Planning is the key to the development of transport networks, for freight and for public transport. Forecasts for 2026 indicate that population in the M5 Corridor will increase by around 300,000 to around 1.8 million, and jobs will increase by 100,000 to 1.1 million. This growth will result in vastly increased commuter traffic competing for space on the M5 Corridor.

If the M5 is to be a major national route for freight, wider options for commuter traffic need to be considered. This includes upgraded public transport and bicycle networks to provide a suitable alternative for commuter traffic.

This approach must be part of proposals for the M5 Corridor upgrade to ensure that the expansion will have positive outcomes on public, freight and commuter transport and the environment.

The State Government to seek a firm Commonwealth funding commitment due to the importance of the M5 Corridor to the national economy

The Australian Government has acknowledged in its recently released National Freight Strategy, February 2011 and National Ports Strategy, December 2010, that it has a primary role to play in the planning and resourcing upgrades to freight/port transport networks. Both strategies also state that transport infrastructure including road, rail, intermodals, ports, airports and distribution/warehousing facilities must be linked, planned and integrated.

In addition, the *Our Cities Discussion Paper* released in December 2010 acknowledges the need for comprehensive planning at national and state level to reduce truck queues at ports, to minimise the potential for urban encroachment and to improve and sustain the competitive position of our international trade gateways.

A successful, integrated road and rail transportation network around the entire M5 Corridor is essential to the success of these goals.

2. Congestion on the regional roads linked to the M5 West

The Environmental Assessment and the Preferred Project Report provide no commitment towards addressing congestion on the regional roads linked to the M5 West, although there is strong evidence suggesting increased delay and traffic queuing, particularly along Stacey Street, Fairford Road and Henry Lawson Drive in Bankstown.

The microsimulation modelling program (*Table 4.1 -M5 AM peak eastbound travel times, Vol 1 of PPR*) shows that the M5 West Widening proposal at this stage only redistributes traffic delay from the western end of the M5 South West Motorway to the eastern end, but does not achieve the overall saving in

travel times. According to the table, the east bound travel time between Henry Lawson Drive-The River Road- Fairford Road- Belmore Road and King Georges Road would increase and the traffic in the surrounding road network including Stacey Street would worsen due to additional queuing from the eastbound on ramp to the motorway.

The M5 West Motorway is part of a larger regional road network and its performance is dependent on the regional network operating efficiently. Currently, there are 'bottle-necks' occurring on the regional roads connected to the M5 West Motorway that is causing the congestion on the regional road network. The congestion is caused by the 'bottle-necks' at Fairford Road, Stacey Street, Canterbury Road and Hume Highway.

Council's concern is that the proposal does not consider the growth that is to occur at these locations over the next 25 years, as identified by the Metropolitan Strategy and the Metropolitan Transport Plan. This includes:

- Intensifying the Bankstown CBD to becoming a Major Centre with 3800 new dwellings and 4000 new jobs. This is addition to the Department of Planning's direction to accommodate an additional 22,000 new dwellings in the City of Bankstown.
- Intensifying the industrial and residential land uses along the Hume Highway Enterprise Corridor.
- The 24-hour operation of the Enfield intermodal freight terminal.
- The critical role of Stacey Street and Fairford Road in accommodating increased north-south traffic between Parramatta and Wollongong.

The cumulative effect of this growth means that the 'bottle-necks' at the connecting points to the M5 Motorway (including Fairford Road, Stacey Street, Canterbury Road and Hume Highway) will worsen.

Council seeks the current application to improve the more serious bottle-necks at connecting regional roads via:

- The construction of a grade separation at the intersection of Stacey Street and the Hume Highway, which is a major bottle-neck in the region.
- The widening of Stacey Street between the Hume Highway and Macauley Avenue.

The RTA's proposal of 'Pinch Point' Program for the upgrade of arterial road network is un-coordinated and almost non-existent. The 'Revised Statement of Commitments' must include the following statement: "The RTA will provide details of timing and sufficient funding of the Pinch Point Program for the upgrade of the support roads surrounding the M5 West Motorway corridor including Stacey Street in Bankstown to ensure traffic flow is improved and connecting residential streets are not affected. "

3. Congestion to the Milperra-Bankstown Airport Specialised Centre

The Environmental Assessment and the Preferred Project Report provide no commitment towards addressing the congestion to the Milperra-Bankstown Airport area which could jeopardise the vision of the Metropolitan Strategy for Milperra- Bankstown Airport, functioning as a Specialised Centre.

The precinct currently supports around 15,400 jobs over 560 hectares of land. By 2031, the Metropolitan Strategy has set a target of an additional 4,000 new jobs in the Centre. This will attract additional freight and vehicle movements to and from the M5 Motorway.

At present, the Specialised Centre has limited vehicle access to the M5 Motorway, namely, Henry Lawson Drive and The River Road. These two regional roads are located predominantly within residential areas and are operating at capacity. Any increase in traffic levels will worsen the congestion and potentially undermine the attractiveness of the Specialised Centre as a place to invest and create jobs.

In addition, the proposal does not consider the proposed intensification of activities at the Bankstown Airport, as outlined in the 2010 Bankstown Airport Preliminary Draft Master Plan.

Council seeks the current application to provide direct on/off ramps to the Specialised Centre. This will allow direct 24-hour freight movements between the M5 Motorway and the Milperra-Bankstown Airport Specialised Centre.

The further benefits of providing an additional on/off ramp at this location includes the alleviation of the congested intersections at The River Road and Canterbury Road, and Henry Lawson Drive and Milperra Road, and the reduction in the number of freight movements in the established residential areas.

4. Outstanding issues from the previous M5 Motorway construction works

The M5 West Motorway exit to Fairford Road is an important gateway to Bankstown LGA. The intersection is currently dominated by concrete with no vegetation.

The Environmental Assessment and the Preferred Project Report provide no specific details at this stage, apart from proposing some minor modifications to the existing planting.

The Department must seek commitment from the proponent to liaise with Council for a preparation of a Landscape Plan to enhance a gateway character of this intersection prior to the approval of the project.

5. Environmental impacts resulting from the proposed works

The Department must consider the following environmental concerns prior to approving the application:

Tree protection measures in works compounds

Council requires the following changes be made to the 'Revised Statement of Commitments' for Flora and fauna, reference FF2:

All remnant native trees within the proposed construction compounds in the Bankstown LGA are to be protected. Protection measures are to include the installation of fencing to the limit of the crown drip-line (the protected tree root zone) which is to be maintained for the duration of site use. Access, storage of materials or structures and vehicular movement is not permitted within the protected tree root zone. Soil levels are not to be modified on the site surrounding the protected tree root zone.

Mitigation of Stormwater Discharge Impacts from Detention Basins

Impacts associated with the construction of new basins or the augmentation of existing drainage basins at Salt Pan Creek and immediately east of the Georges River will not only be related to increased pollutant loads but also increased scour and erosion potential arising from increased volume, concentration and velocity of basin discharges.

The above is a clear evidence of erosion and ecological community degradation arising from the discharge from the existing M5 detention basins at Salt Pan Creek. The current management of basin discharge at this location is considered to be sub-standard, resulting in erosion at the immediate point of discharge (concentrated high velocity discharge) and uncontrolled dissipation of the flow downstream causing direct physical degradation of the Estuarine rushland/remnant Swamp Oak Floodplain Forest (an Endangered Ecological Community).

It is essential that all discharges from the new and augmented drainage basins at Salt Pan Creek and the Georges River be stabilised between the point of discharge and the confluence with the natural waterway in order to minimise impacts associated with erosion and stormwater deposition into native vegetation and to assist with the implementation of ecological community restoration in these impacted areas.

Stabilisation treatments should be consistent with the revised commitment reference WS5, and is recommended to include a rock-lined channel (or similar) with adequate capacity to carry the maximum potential volume of basin discharge. The works are to minimise the impact on native vegetation / endangered ecological communities in these locations. Impact assessment

and potential offsetting is to be undertaken to the standard required by the NSW Office of Environment and Heritage.

Additionally, Council wishes to highlight the need in these locations to preserve the existing public pedestrian foreshore access (boardwalks and tracks). Drainage basin construction and the discharge stabilisation works are to be undertaken in a manner which ensures that safe public access (and infrastructure) is maintained / reinstated during and after the works.

6. Construction noise and vibration impacts

Council is concerned that the *Revised Statement of Commitments* does not correspond to quantifiable measures to monitor construction and operational noise impacts of the proposal since the *EA* and/or the *Preferred Project Report* does not provide a measurable noise mitigation program.

Council requests Construction Noise Management Plan be prepared prior to the approval of the application to ensure that sufficient mitigation measures are in place to ensure that noise concerns are managed appropriately.

Depot noise impacts

Three depots have been identified in the City of Bankstown for 24-hour construction Compound. The noise impact of the 24 hour construction on these locations would be quite severe for surrounding residential properties at two locations.

Council is concerned that access onto M5 from Beaconsfield site compound is not clear. It is anticipated that the construction vehicles may enter via The River Road and Beaconsfield Road, which is predominantly residential. The proposed site in Gibson Avenue (60-64 Gibson Avenue, Padstow) which fronts to residential properties directly opposite Gibson Avenue is no longer available due to the recent development.

Operational noise impacts

Council is concerned that the new changes to the noise barriers and installation of architectural treatments will have a negative impact on the amenity of the residents, such as limiting solar access into a dwelling and glare problems during the night which have not been discussed in the Environmental Assessment and/or the Preferred Project Report.

The Preferred Project Report currently does not specify noise mitigation details for reducing noise impacts on sensitive land uses where noise criteria are exceeded.

The 'Revised Statement of Commitments' must include the following statement: "Bankstown City Council and all affected properties within the study area will be consulted prior to the commencement of the project to discuss and develop an Operational Noise Management Plan to mitigate the noise impacts."