

Attachment – Additional Council Comments

On-off Ramps for Elizabeth Drive

Council notes that the project currently makes provisions for the primary access to WSIA with connections at the following two interchanges and an intersection:

- a motorway-to-motorway interchange at the M7;
- a grade separated interchange to Western Sydney International (Nancy-Bird Walton) Airport (WSIA); and
- a signalised intersection at The Northern Road.

The proposed M12 Motorway does not include a direct connection to Elizabeth Drive. The proposed M12 Motorway will provide limited access to the surrounding areas, including:

- the planned employment precincts along Elizabeth Drive;
- the future business parks in the Western SIA;
- the Western Sydney Aerotropolis; and
- the South West Growth Area.

On/off ramps at Elizabeth Drive are essential. If on/off-ramps are not provided, the forecast growth will have an unacceptable impact on Elizabeth Drive (which will require road widening in the medium term).

At its meeting with RMS on 28 October 2019, Council expressed its dissatisfaction with the lack of on/off ramps onto Elizabeth Drive. Council resolved that this dissatisfaction be included in the submission. Council has also made a separate representation to the Minister for Transport and Roads on the need for an interchange along the proposed M12 Motorway connecting to Elizabeth Drive.

Part of Kemps Creek have the potential for new industrial developments, given the proximity to the proposed M12 Motorway. Significant economic activity is expected to occur not only in Kemps Creek, but also the Western Sydney Aerotropolis and the Western Sydney Employment Area (WSEA) in the near future. The proposed M12 Motorway must be designed to improve access to the future industrial and freight hubs and other planned developments in the Western Sydney Aerotropolis, WSEA and the South West Growth Area.

Recommendation 1

It is recommended that the proposed M12 Motorway include on/off ramps in the vicinity of Elizabeth Drive/Mamre Road/Devonshire Road to support economic and population growth in the surrounding areas and minimise impacts on the surrounding road network.

Travel Demand Analysis

Council notes that the land use forecast in the travel demand analysis does not include future employment and population growth from the Western Sydney Aerotropolis.

The standard land use scenarios (LU14) used in WSAGA mesoscopic models are not the latest land use forecast from TfNSW STM models. In addition, modelling should recognise that Fifteenth Avenue is now planned as a rapid transit corridor with a predominantly public transport and active transport function.

Recommendation 2

The transport models need to be updated to include the latest land use and transport infrastructure assumptions to ensure that the project provides transport, economic and social benefits to a wide area (i.e. the Western Sydney Parkland City).

Active Transport Network

It is noted that the concept design of the motorway includes a shared path. Council supports the construction of high quality grade-separated active transport links proposed with this project. Consistent with international best practice and NSW Centre for Road Safety research,¹ where possible these paths should physically segregate walkers from other forms of active transport (ie. cyclists and micro-mobility)

Recommendation 3

The proposed active transport network must integrate with the existing and planned pedestrian and bicycle networks within the local area, particularly in proximity to the Western Sydney Parklands.

The design features should, at a minimum, be of the same standards as those provided along the M7 Motorway. Where possible these paths should physically segregate walkers from other forms of active transport (ie. cyclists and micro-mobility).

The shared path is to have generous landscaping and canopy trees to improve amenity and ensure that paths are climatically comfortable to be used throughout the year.

Tree species within close proximity to the WSIA will need to be selected to minimise the potential for bird-strike and wildlife strike from planes.

Construction Traffic Management Plan

Council notes that the construction haulage routes are along the M7 Motorway, Elizabeth Drive, The Northern Road and the M4 Motorway. The Elizabeth Drive/M7 Motorway southbound ramps will be operating at LoS F and a section of The Northern Road will also be congested. Hence, to minimise construction impact, delivery of construction materials should be restricted to outside of peak traffic hours.

Council has been receiving representations regarding increasing traffic delay at Elizabeth Drive and Devonshire intersection. Construction traffic will worsen this condition. Due to the forecast significant construction traffic along Elizabeth Drive, its intersection with Western Road and Devonshire Rd will experience increasing delay.

Recommendation 4

¹ <https://roadsafety.transport.nsw.gov.au/downloads/shared-paths.pdf>.

Interim intersection treatments such as roundabouts or traffic control signals are to be provided.

A detailed construction traffic management plan is to be developed in consultation with the Transport Management Centre (TMC), Fairfield, Liverpool and Penrith Councils before commencing the construction works. New traffic survey data is to be collected as part of preparation of the construction traffic management plan.

Council requests that where local roads are to be affected during construction, Council and the local community are to be appropriately informed. Appropriate road occupancy permits are to be obtained before 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.

Motorway Lighting

Due to the location of the motorway corridor with respect to WSIA, street lighting design should be carried out in consultation with the Airport company to ensure that there will be no impacts on the operation of WSIA.

Noise and Visual Impact

Council is concerned that the southern off-ramp from the proposed M12 Motorway onto the M7 Motorway within Western Sydney Parklands (WSP) will be close to the Cecil Hills residential area. This is likely to have visual and noise impacts on the residential area.

If night-time construction is to be carried out, noise mitigation measures should be implemented in accordance with EPA policy.

Recommendation 5

The off-ramp should be moved as far as possible away from the residential area and must include appropriate noise and landscaping mitigation measures to limit these impacts.

The project is to ensure that existing properties that will be exposed to increase traffic noise (particularly within Cecil Hills) are to be assessed and if required, attenuation measures implemented.

Climate Change, Landscaping and Urban Heat Mitigation

Appropriate sustainability measures should be included in the detailed design and construction phase of the project, recognising the NSW Government's commitment to net zero emissions by 2050 and the shift to a circular economy.

Recommendation 6

A climate change monitoring and management framework should be prepared for the project. The framework will incorporate performance monitoring criteria and periodic review of the climate change risk assessment.

The project should also identify, and plan for, opportunities to incorporate resource efficiency and circular economy principles into the entire project lifecycle.

In summer months, urban heat is evident in Western Sydney. Large paved areas are known contributors to urban heat and increasing tree canopy cover is considered as one of the preferred solutions to tackle this urban heat.

Consideration should be given to providing barriers at the sides and median of the motorway, rather than providing clear zones, to ensure that canopy cover is maximised. Incorporation of passive irrigation, swales and other water sensitive urban design (WSUD) approaches must be considered to maximise vegetation health, reduce water pollutant discharge and to maximise a closed loop water management cycle.

Recommendation 7

A landscaping plan should be prepared for the full length of the motorway, with an aim to provide broad canopied trees which maximises the extent of shading on the carriageway. Increasing tree canopy cover and planting of shading trees along the motorway corridor should be incorporated in the landscaping plan. The landscaping plan should be consistent with the Greater Sydney Commission's aspirations for this to become the 'Western Parkland City'.

Impact on Western Sydney Parklands

The Western Sydney Parklands (WSP) are a nationally significant environmental and recreational resource. The WSP are a centrepiece of the future Western Parkland City and there are significant plans to further enhance and develop the opportunities associated with this asset. It is critical that infrastructure projects do not diminish the experience or facilities available to Western Sydney residents and visitors at WSP.

Council acknowledges that changes have been made to the project design, to date, to reduce the impact of the M12 Motorway on WSP. In order to appropriately manage and avoid any remaining impacts Council encourages the development of the M12 Motorway to proceed in close partnership with WSP1 and guided by expert advice from WSP.

Recommendation 8

Project development proceed in partnership with the Western Parkland Trust to ensure that any adverse effects on the WSP are appropriately avoided, remedied or mitigated

Ecological Impact

- a) Within the WSP, fauna surveys are predominantly restricted to land that is in close proximity to the M7 (as shown in Figure 4-1 of the BAR). Relatively little survey effort is evident within the WSP portion of the study area that is located directly to the south of Elizabeth Drive.

Recommendation 9

It is recommended that additional fauna surveys are undertaken within the area south of Elizabeth Drive, or justification provided to demonstrate that the current survey adequately represents portions of the study area that appear to have relatively little survey effort expended on them.

- b) The report assumes that potential habitat for the threatened Cumberland Plain Land Snail is restricted to 6 ha of riparian forest along Badgerys Creek. Section 4.2.5 (threatened fauna species results) of the BAR states that 'Habitat assessments determined that all potential habitat for this species within the remainder of the study area is in poor condition and heavily impacted by historical and current disturbance,

fragmentation and isolation'. Annexure B (Habitat assessment table) does not include robust justification for this assumption.

Recommendation 10

It is recommended that further justification is provided to support this assumption, or additional areas are assumed to be potential habitat for this species.

- c) The BAR assumes that suitable habitat for threatened woodland birds, owls and diurnal raptors (as listed in Section 4.2.5 (threatened fauna species results) of the BAR) is not present within the study area based upon targeted surveys and habitat assessments. Annexure B (Habitat assessment table) does not include robust justification for this assumption. It is recommended that this assumption is further justified, or further consideration be given to these species, particularly given the apparent limited extent of terrestrial habitat assessments and targeted surveys undertaken within the portion of WSP directly south of Elizabeth Drive (as shown in Figure 4-1 of the BAR).

Recommendation 11

It is recommended that clarification is included within Figure 4-2 (recorded threatened species) of the BAR regarding whether 'Southern Myotis breeding habitat' records are also 'hollow bearing tree' records.

- d) Section 8.2.3 (removal of threatened flora) of the BAR notes that 90 individuals of the threatened *Pultenaea parviflora* would be cleared near Clifton Avenue, and that a population of 18 individuals within WSP is likely to be lost due to habitat fragmentation and degradation. Table 8-8 (summary of threatened flora species impacts) notes a direct impact to 90 individuals and no individuals being indirectly impacted, which is not consistent with the preceding text.

Recommendation 12

It is recommended that this table, and other sections that reiterate this information, are revised to reflect the impacts noted within the text of section 8.2.3.

Recommendation 13

It is recommended that the corridor near the M7 motorway, as recognised in Section 8.5.4 (fragmentation of identified biodiversity links and habitat corridors) of the BAR and other resources such as BIO Map and the WSP Plan of Management, is also shown in Figure 8-4 (local and regional fauna connectivity).

- e) Limited details are included regarding the extent of the impacts to the corridor near the M7, and proposed mitigation measures. Section 8.5.4 (fragmentation of identified biodiversity links and habitat corridors) is ambiguous regarding which text is intended to apply to the riparian corridors and which text is applicable to the corridor near the M7 motorway. It appears that most details are only intended to be applicable to the riparian corridors. Further, mitigation measures noted in other sections of the BAR (eg section 8.5.6 and chapter 10) for corridors are focused on the major creek crossings.

Recommendation 14

It is recommended that further details are provided for the likely impacts to the corridor near the M7 (in terms of flora species and ecological communities, as well as fauna), and proposed measures to minimise vehicle strikes and maintain or improve connectivity.

Heritage

- a) There are approximately 19 Aboriginal archaeological deposits and seven heritage items that are within the proposed M12 Motorway.
- b) The reports have indicated a number of assessments to be undertaken post EIS, which is inappropriate and should be included as part of the EIS.
- c) The Aboriginal Assessment does not show the area surveyed, nor does it show where testing was undertaken. Details of the testing locations are to be provided. The Aboriginal Assessment does not include any sensitivity mapping. Confirmation is required whether additional areas of high sensitivity were identified beyond the PADs.
- d) Archival recordings are not appropriate mitigation measures. Further consultation is required with Council to discuss the measures to mitigate the impacts on the heritage asset.
- e) The proposed M12 Motorway has the potential to impact the Upper Canal in Cecil Hills. The Upper Canal is tunnelled in this location.

Recommendation 15

It is recommended that a detailed archaeology investigation is undertaken to assess potential impacts on the Upper Canal.

In addition, the information provided does not include a landscape heritage assessment. Such assessment should be undertaken.

Flooding, Drainage and Water Quality

Flooding

The proposed M12 Motorway crosses a number of creeks and waterways including:

- Cosgroves Creek;
- Badgerys Creek;
- South Creek; and
- Kemps Creek.

Surface Water Quality and Hydrology

The proposed M12 Motorway will generate a significant amount of surface water pollution. The design of the proposed M12 Motorway should include stormwater treatment in accordance with the principles and guidelines of water sensitive urban design (WSUD). The design shall allow collection of stormwater runoff, removal of gross pollutants and nutrients as per Liverpool Council's water quality reduction target. The design should include water quality modelling using Liverpool Council's MUSIC Link.

A meeting is required between Council and RMS to discuss measures to ensure surface water pollution is minimised in accordance with Liverpool City Council's Development Control Plan.

Employment and Economic Impacts

Council is concerned that the Employment and Economic Study has not fully addressed the possible impacts of the project, particularly on small businesses in the immediate area.

Recommendation 16

It is recommended that an economic impact strategy be developed to assist and/or support those different types of businesses that may be affected during construction and/or operation. The current document does not address this effectively.

The cost of this project is \$1.5 billion and is projected to create between 600 and 800 direct jobs (along with a significant number of indirect jobs).

Contracts for the construction and operation of the proposed M12 Motorway should require contractors to employ at least the same percentage of local people and apprentices as WSIA has committed to under airport construction contracts. See: <https://westernsydney.com.au/index.php/media-releases/major-earthworks-contract-means-jobs-locals-apprentices-and-trainees>. There is a recognised jobs deficit in this area and such actions would help alleviate this challenge.

WSIA has committed to a Skills Exchange model, in conjunction with NSW TAFE. <https://www.tafensw.edu.au/wsa>. This model is proving successful in delivering outcomes for locals to access training in an area of recognised skills shortages. The M12 project should also replicate this model, leveraging existing TAFE educational assets in the Liverpool local government area.

Recommendation 17

It is recommended that the proposed M12 Motorway should replicate WSIA's employment target and skills training obligations. The Government should also conduct local information sessions in partnership with the ICN Gateway <https://gateway.icn.org.au/> and list works projects on the Gateway.