

The UDIA NSW is the peak body representing the interests of the urban development industry in New South Wales. We represent over 500 member companies that are directly involved in the industry including developers, consultants (engineering, planning, legal, environmental, design) and local government, for the goal of Liveable, Affordable & Connected Smart Cities.

The Urban Development Institute of Australia – NSW (UDIA) is pleased to respond to the M12 Amendment Report.

Summary of proposed changes

The proposed changes to the project as described in the EIS are outlined below:

- Amendments to the motorway-to-motorway interchange at the M7 Motorway, including:
 - Changes to Elizabeth Drive and Cecil Road intersections, proposed exit ramps, the Wallgrove Road connection to Elizabeth Drive and proposed shared user path realignments
 - The widening of Elizabeth Drive under the M7 Motorway and approaches
- An option to provide a new connection between the M12 Motorway and Elizabeth Drive near the M7 Motorway interchange. The delivery of this option would be subject to available funding.
- Two new signalised intersections into the Western Sydney International Airport, with provisions for future connection to potential developments north of the Western Sydney International Airport
- Additional ancillary facilities to support the delivery of the project.

Figure 1: M12 Amendment summary

The Design Amendments described in the EIS provide some clarity of the proposed changes to the project, however uncertainties and concerns still exist which we draw your attention to below, within the specific context of land within the Northern Gateway initial precinct in the Aerotropolis.

Key issues and concerns

1. Project Design & Regional Objectives

Industry requested access improvements at the interface of the new Western Sydney International Airport (**Airport**) for the Northern Gateway in the initial EIS exhibition period in 2019, highlighting concerns that a grade separated intersection between the M12 Motorway and Elizabeth Drive would not allow for easy access especially given that no entry and exit ramps are shown to be provided at Elizabeth Drive.

The Design Amendments feature two new signalised intersections into the Western Sydney International Airport on Elizabeth Drive, as an option dependent on funding, but do not provide entry and exit ramps.

Concern remains that without exit and entry ramps the result will be increased running times for logistics vehicles destined to/from employment lands in the Northern Gateway, increased congestion within the Airport and reduced functionality of the precinct as a whole, with particular reference to the potential impact on access to employment land.

Recommendation: For Industry, WSA Co., Western Sydney Planning Partnership (WSPP), strategic planning divisions within the Department of Planning, Industry and Environment (DPIE) and TfNSW to collaborate and advocate for increased project funding for such potential direct access opportunities from Elizabeth Drive onto the M12 Motorway that deliver optimal traffic solutions and employment outcomes in the Aerotropolis and the Airport.

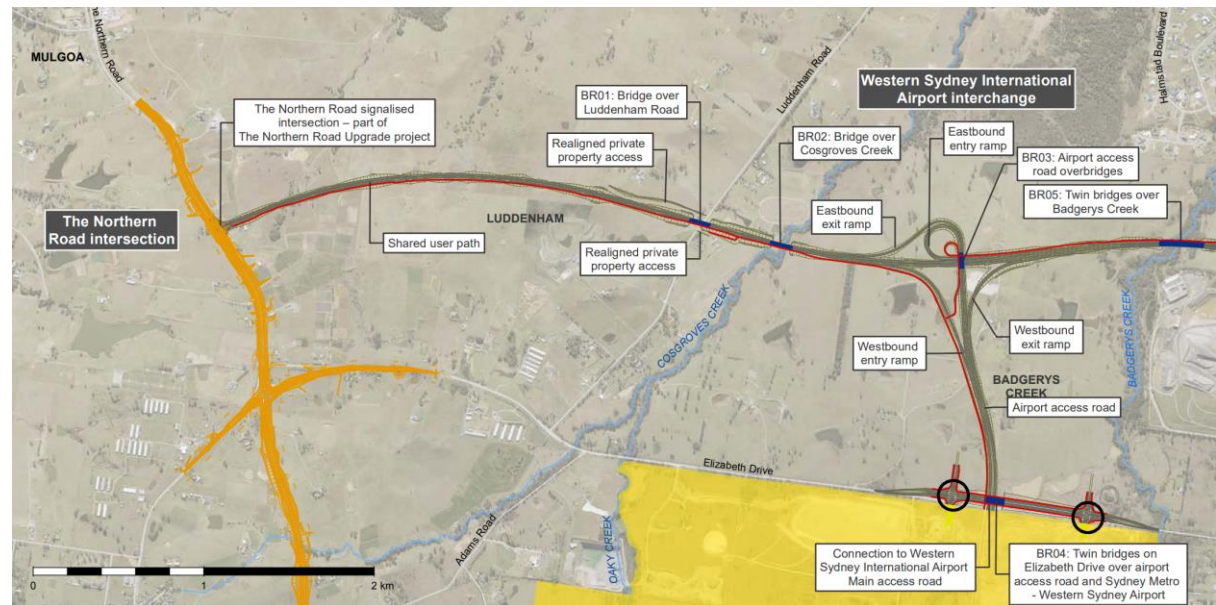


Figure 2: Source: TfNSW map

2. Land Fragmentation Limits the Vision for the Aerotropolis and the Objectives of Zoned Land Uses

Industry requested TfNSW provide solutions to avoid land sterilization and fragmentation that would reduce potential development and job outcomes for the area considering future land uses. In response TfNSW will be reinstating equivalent access for land impacted, based on existing land uses.

Since the EIS was released, future developable land within initial precincts in the Aerotropolis has been rezoned Enterprise, Mixed Use & Agribusiness, however the Design Amendments still only provide minimal access. Concerns about the adequacy of the M12 design to accommodate future land uses remain. For example the project access path beneath Bridge 02 over Cosgroves Creek will be inadequate given positioning of a water quality basin, potential flood impacts, the size of the site the path connects to and the significant role such landholdings will play in the development of the Aerotropolis.

Given the significant amount of strategic planning work being undertaken within the Aerotropolis, the design must consider how the future road network within the Aerotropolis could be planned to facilitate the land uses envisaged by the Western Sydney Aerotropolis Plan (WSAP) and must demonstrate how connections can be made across the M12.

Recommendation: The Design Amendments be further updated considering the current zonings and future uses to ensure that landholdings won't be isolated by the proposed M12 design. Additionally for Industry, WSPP working groups, strategic planning divisions within DPIE and TfNSW to collaborate to ensure that a coherent road network plan is developed that limits land fragmentation and plans for connectivity within precincts and individual land

holdings as part of precinct planning for the area. Lastly, TfNSW to share updated traffic modelling with industry and for TfNSW to consider precinct wide and regional connections.

These above issues will directly affect the ability to develop the area and therefore the creation of jobs in Western Sydney. It is imperative that transport and land use planning work currently being undertaken by Government is sufficiently integrated and flexible to enable best outcomes for the region.

3. Broader infrastructure considerations

The UDIA's 2018 Building Blocks report (attached) highlighted the extent of missing infrastructure items in the land release areas of Western Sydney. UDIA strongly recommends that more detail regarding service infrastructure be included in the Plan, backed by an Urban Development Program (UDP) similar to the program demonstrated by UDIA in Blacktown and currently in underway in the South West, that would coordinate growth and servicing across the Aerotropolis.

An Urban Development Program would also ensure the Airport is not serviced as a 'Commonwealth island'. UDIA highlights the lack of a clear regional road network, which would connect Western Sydney for commuters and freight networks. Two aspects of the plan stand out as barriers to better transport connectivity, more broadly:

Two aspects of the plan stand out:

1. **Employment Lands** - There is no indication of any ramps connecting the M12 to Elizabeth Drive. This could lead to problems with access to major employment lands near the Airport; and
2. **M5 Motorway Extension Indicative Corridor** - The plan identifies a corridor for a Motorway standard link the M9/OSO from the M5. The M9 overlaps at a key section of the current SIC project between the M7 and Badgerys Creek Road. We would like to see these interface issues addressed.

There is no discussion, detail or evidence provided in the Plan to justify this major item of transport planning. Furthermore, no corridor of this nature was identified in Transport for NSW's 'Protection of Transport Corridors in Western Sydney' exhibition in March 2018. Heavy rail is the key element that will define the urban structure and place outcomes across the Aerotropolis.

Should you wish to discuss any of the above commentary further, noting that additional site specific concerns exist in addition to those raised above, please do not hesitate to contact Kit Hale on 02 8330 6907 or khale@udiansw.com.au.

Sincerely,



Steve Mann
Chief Executive
UDIA NSW