

12 November 2019

Secretary Department of Planning, Industry and Environment  
GPO Box 39  
Sydney NSW 2001

### **RE: M12 Motorway Environmental Impact Study (EIS)**

This letter has been prepared by Celestino Developments SSP Pty Ltd to provide feedback on the recently released M12 Motorway Environmental Impact Assessment and its implications for Sydney Science Park, Northern Gateway and North Luddenham Precincts. We have structured the feedback below based on four key areas:

- The Northern Road and M12 Motorway intersection
- Re-alignment of Adams Road and Luddenham Road
- Expected traffic implications on Luddenham Road
- Mamre Road and Devonshire Road intersection

#### **1. The Northern Road and M12 Motorway planned intersection**

The *M12 Motorway EIS Transport and Traffic Assessment Report* includes a new signalised intersection at The Northern Road with the proposed M12 Motorway. The results of the analysis indicate increased delays along The Northern Road and additional delays from increased traffic travelling from the M12 Motorway as shown in Fig 6-26. This will reduce the attractiveness of The Northern Road as the primary north-south corridor through the Western City and Western Sydney Aerotropolis. Further, this is likely to lead to additional traffic on Luddenham Road as it becomes an alternative to The Northern Road, especially for traffic travelling to and from M4 Motorway.

*Clarification #1.1: Can you provide further detail regarding the decision and justification to design The Northern Road and M12 Motorway as a signalised intersection rather than a grade-separated interchange. This appears not to be covered in the M12 Motorway EIS and warrants further clarification.*

#### **2. Re-alignment of Adams Road and Luddenham Road**

The road network assumptions identified in *M12 Motorway EIS Transport and Traffic Assessment Report* (as per Section 3.4.2) show the realignment of Adams Road with Luddenham Road at Elizabeth Drive. We understand the original design for the upgrade of The Northern Road (i.e. arterial road) proposed an overpass at Adams Road (i.e. local road) with no direct connection to The Northern Road. This was undertaken to provide an appropriate hierarchy of roads to serve and separate local and regional traffic, infiltrating Luddenham Town Centre along Adams Road and Luddenham Road.

The approved modification of The Northern Road Upgrade; to replace the bridge proposed over The Northern Road at Adams Road with a new intersection allowing all movements; would further increase the attractiveness of Luddenham Road. The re-alignment of Adams Road with Luddenham Road will make Luddenham Road a faster alternative to The Northern Road for trips travelling from the South West Growth

Area (SWGA), Western Sydney Aerotropolis to the M4 Motorway. This will be further exacerbated by planned future development in Orchard Hills to the north of Sydney Science Park.

*Clarification #2.1: Can you provide more detailed justification for the realignment of Adams Road and identify how the existing local road function of Adams Road and Luddenham Road (unclassified regional road) will be maintained once this realignment is undertaken.*

*Clarification #2.2: The forecast performance of the Adams Road and Luddenham Road intersection exceeds the desired Level of Service D for the future evening peak, indicating the subject intersection design proposed within the EIS will be inadequate to meet the forecast traffic demands. Can you advise what measures will be undertaken to meet the desired levels of service as indicated in the EIS assessment for this intersection.*

*Clarification #2.3: Can you please provide a clear strategy and road network plan to manage the local road network (i.e. Adams Road and Luddenham Road etc) to achieve local accessibility objectives balanced against amenity and environmental aims. This is a significant gap within the current M12 Motorway Transport and Traffic Assessment Report.*

### **3. Expected traffic implications on Luddenham Road**

Forecast traffic volumes and traffic growth along Luddenham Road are in the order of 300-400% over 20 years. The *M12 EIS Transport and Traffic Assessment Report* (refer to Section 3.4.2) shows that traffic forecasts are derived from land use forecasts from 2014, with Western Sydney Airport traffic generation from 2018. These key land use forecasts are likely to be outdated and do not align with land use forecasts adopted within the *Greater Sydney Regional Plan, Western Parkland City District Plan* and *Future Transport 2026*

*Clarification #3.1: Can you please provide more recent traffic volume forecasts that reflect more recent assumptions surrounding land use in the area to give stakeholders within the Northern Gateway a more accurate picture of the road network performance in the future.*

*Clarification #3.2: Given the extensive traffic growth on Luddenham Road can you please advise why the EIS has not recommended the reclassification of roads such as Luddenham Road (currently a local unclassified regional road) to a primary movement corridor like Mamre Road to cater for through and regional traffic which is controlled and funded by NSW Government.*

### **4. Mamre Road and Devonshire Road intersection**

The M12 Motorway Transport and Traffic Assessment Report shows significant forecast traffic volumes on both Mamre Road and Devonshire Road. Given the reported high delays along Elizabeth Drive at the M7 Motorway, there appears to be no assessment for the provision of an grade separated interchange at Mamre Road and Devonshire Road. An interchange would provide an alternate route for traffic travelling into central Sydney via the M4 Motorway, that would otherwise need to travel via Mamre Road (an arterial road) interchange or M7 Motorway via Elizabeth Drive. We consider the omission of an interchange at this location will place greater pressure on Mamre Road and Elizabeth Drive, in turn increasing traffic volumes on parallel north-south roads such as Luddenham Road.

*Clarification #4.1: Can you please provide further justification on why a grade separated interchange on M12 Motorway at Mamre Road was not considered as part of the EIS, as this appears to be a missing connection in the overall corridor.*

We would like to thank the Department of Planning, Industry and Environment (DPIE) and Roads and Maritime Services (Roads and Maritime) for the opportunity to comment on the *M12 Motorway Environmental Impact Assessment*. We look forward to receiving a response to the clarifications outlined in the letter above.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'E. D'Angola', with a long horizontal flourish extending to the right.

Emidio D'Angola  
Director of Infrastructure  
Celestino Pty Limited