



**Western  
Sydney  
Airport**

18 November 2019

**Ms Naomi Moss**  
Department of  
Planning, Industry  
and Environment  
GPO Box 39  
Sydney NSW 2001

## M12 Motorway Environmental Impact Statement (SSI 9364)

Dear Ms Moss

I refer to the notice of M12 Motorway Environmental Impact Statement (EIS) on exhibition for public comment.

Western Sydney Airport (WSA) is strongly supportive of the project as essential infrastructure to support the development of Western Sydney International (Nancy-Bird Walton) Airport (WSI) and the growth of the region. In response to the EIS, WSA would like to highlight matters relating to achieving its own project objectives, notably improving access to aviation services for Western Sydney, as well as the objectives for of the proposed M12 development.

### **Connectivity and Access**

Mirroring other objectives for WSI, the EIS indicates that the project is essential for the State for economic reasons, and for facilitating the access to WSI, surrounding employment lands and South West Growth Area. The objective of the M12 Motorway project is to provide road capacity and connectivity, while integrating with the broader transport network and preserving the access function of Elizabeth Drive. Improving transport connectivity to the greenfield location of WSI was the primary reason for the Western Sydney Infrastructure Program funding announcement in April 2014, made ahead of the decision to build the airport. When the airport opens in 2026 it will be the closest international airport for around three million people and the M12 will constitute the primary means of road access.

Broadly, WSA's concern is that the scope of the M12, as identified in the M12 EIS, does not optimise the opportunity to connect to WSI and the locality from the east. Consultation by WSA with Transport for NSW (TfNSW) and, formerly, Roads and Maritime Services (RMS) on the M12 over the two years since WSA's formation has emphasised the need for improved connectivity at the M7 and airport ends of the M12 (Elizabeth Drive), and at a mid-point in the vicinity of Mamre and Devonshire Roads. It is noted that the EIS states that the M12 project would support the growth of the Western Sydney Aerotropolis by providing a providing a high-speed motorway between The Northern Road and M7, which will allow traffic to avoid travelling on Elizabeth Drive.

Whilst the design provides a motorway standard east-west connection, there are no other on or off ramps between the Airport Interchange and the M7 and as such, there is no alternative capacity in the road design or exit opportunity in the event of an incident that blocks the M12.

An additional interchange in the vicinity of the Mamre Road and Devonshire Roads will have the benefit of:



- providing network redundancy by providing an exit off (or onto) the M12 between the Airport (and M7);
- providing toll-free access to the M12 via Mamre and Devonshire Roads (and Elizabeth Drive); and
- providing access the Western Sydney Aerotropolis growth area.

To achieve adequate network circulation with an appropriate level of redundancy in the event of the M12 being blocked or heavily congested, WSA has suggested improved, un-tolled connection when joining from the east, rather than only via the M7, and also a grade-separated interchange with Elizabeth Drive at the airport site entrance. This would facilitate local as well as airport traffic and appropriate modal separation for traffic entering the site. Such added connectivity would better align with the project objective to provide a road that supports and integrates with the broader transport network.

WSA welcomes the NSW Government's commitment to providing toll free access via the M12 to the new airport which provides clear equity with regard to the toll free access being provided to Sydney (Kingsford Smith) Airport via the Sydney Gateway project.

WSA is concerned, however, with the absence of on/off ramps at Mamre and Devonshire Roads, given there is no alternative egress for road users. This effectively forces road users onto the tolled M7 motorway in order to access the toll-free M12 from the north or take what may be a heavily congested Elizabeth Drive as road users seek to avoid the M7 toll. Without appropriate pass through access, congestion in and around the airport would be highly detrimental to the efficient ingress and egress to the airport. Traffic congestion on Elizabeth Drive as a result of road users avoiding the M7 toll would impact local traffic and communities with heavy vehicles, in particular, choosing the toll-free option. This would potentially impact the commercial viability of the airport due to inefficient road access.

#### *Airport access from Elizabeth Drive*

With respect to a grade-separated road interchange at the entrance to the airport, the EIS should address the design and operation of intersections at either end of the Elizabeth Drive overpass. Throughout the EIS it is indicated that the access from Elizabeth Drive is not preserved. For example, Figure 1-3 (see over) indicates that access points from Elizabeth Drive into the airport site, identified in the Commonwealth's *Western Sydney Airport – Airport Plan* (December 2016), roughly at the location of Taylors Road in the west and the realigned Badgerys Creek Road in the east, have not been appropriately considered.

The additional access points have been identified on the Airport Site Layout provided to TfNSW and RMS. These roads provide secondary access to the terminal, aviation support facilities as well as the business park lands. They provide necessary network redundancy and emergency access and egress in the event of the M12 being unavailable for any reason and are therefore critical to the operation of WSI. Further, based on discussions with TfNSW, these access roads will also be used by the planned regional bus services to the airport from Liverpool, Penrith, Campbelltown and Parramatta.



*Extract from M12 EIS - Figure 1-3*

The majority of WSI development to service the first runway in the early years of its operation will be on the north-western side of the airport site. Access to and from Elizabeth Drive via the western secondary access road for aviation support activities is fundamental to this.

The eastern connection from Elizabeth Drive is part of the Badgerys Creek Road realignment project and connects traffic and public transportation with the Business Park and airport terminal. The roundabout works on Elizabeth Drive and realigned Badgerys Creek Road intersection are underway and are expected to be finalised by May 2020. The realignment of Badgerys Creek Road was first proposed to RMS in 2016 and authorised by RMS in 2019.

WSA considers it essential to reflect both intersection requirements in the design and provide connectivity to Elizabeth Drive on both sides of the main access road.

#### *Access from M12 to Elizabeth Drive*

The M12 design does not include on and off ramps to Elizabeth Drive at the entry to the airport site. These ramps will be important to service the development of land adjoining WSI.

WSA's Airport Site Layout has, to date, shown a major interchange within the airport site connecting the eastern and western access roads and the airport main access road. While the current Layout shows this, since late 2018 WSA has identified that this is to be removed from future plans and that this interchange will not be built: a major interchange is not required as part of the airport's internal road network for the initial stage of the airport development. Some connectivity will be maintained to ensure connection from Elizabeth Drive into the airport, closer to the Terminal, to facilitate airport traffic connections only.

The M12 design should not rely on the availability of a major interchange within the airport site to provide a local traffic solution and alternative connection to Elizabeth Drive. Such an approach would be inadequate and inappropriate for the immediate and ongoing demand and likely lead to the type of traffic conflict and congestion issues experienced at and around Sydney (Kingsford Smith) Airport.

The issues adjacent to Sydney's existing airport should not be repeated, noting the exceptionally high costs associated with establishing requisite connectivity later once other development has taken place.



WSA's suggested solution for improved connectivity at the airport entrance has been on and off-ramps to the M12 from signalised intersections at either end of the Elizabeth Drive overpass that tie into the realigned section of Badgerys Creek Road in the east and/or to the secondary airport access road to the west. However, there are many options that deliver some or all of the necessary connectivity that should be evaluated as part of the EIS.

Improved M12 connectivity at the entrance to the airport would also be responsive to the increase in road traffic from the growth of the airport and other developments anticipated in the Western Sydney Aerotropolis, particularly the Northern Gateway precinct identified in the Western Sydney Aerotropolis Land Use and Infrastructure Implementation Plan (LUIIP). The M12 should provide access to these growth precincts as part of a regional road network solution.

One consequence of the current design may be substantial volumes of traffic entering the Airport site and circulating through the Airport's road network in order to gain access to Elizabeth Drive. This could include a substantial number of heavy vehicle movements given the likely nature of future developments in the Northern Gateway precinct. Elizabeth Drive is also a State Road and designated Heavy Vehicle truck route and as such, the M12 should provide the required connectivity by having a design that includes on and off-ramps at Elizabeth Drive.

Further, the design of the M7 and M12 intersection does not consider connection opportunities between M12 and Elizabeth Drive. This may result in an increase in traffic from Liverpool and surrounds using Elizabeth Drive to access the airport in lieu of the M12. Access from Elizabeth Drive onto the M12 would ease of traffic flow from Liverpool and surrounds to WSI, potentially delaying investment in Elizabeth Drive. Alternatively, the EIS should evaluate bringing forward investment in Elizabeth Drive to provide the requisite connectivity to the airport for the residents of the wider region without the negative impacts for more local residents.

### **Construction and Access**

WSA notes that the period of construction through to 2025 will be a period of intense construction activity in the local region, not only by WSA and in the delivery of the M12 and other roads but also in the anticipated construction of the Sydney Metro rail service adjacent to the M12 and in the potential private developments responding to increased economic activity.

WSA commits to ongoing participation in traffic and transport liaison groups that seek to ensure coordination of construction traffic activities, minimise traffic delays, address local community amenity (notably re noise and dust) and maintain road safety.

For the airport, much of this traffic activity will access and egress the airport site via Elizabeth Drive and realigned Badgerys Creek Road. Further, traffic in the region continues to grow generally, including the proposed expansion of the Suez waste facility on Elizabeth Drive. Activities, such as the Elizabeth Drive road closures at Mamre Road and M7 (5.24.17 Table



5-18), need careful coordination to ensure no critical impact on surrounding construction activities.

### **Environmental and Cultural Heritage**

WSI and the M12 will play a critical part in transforming the landscape of Western Sydney and setting a standard for visual amenity. Urban design, drainage, landscaping species choices and maintaining biodiversity sympathetic to cultural heritage will also need to respond to aviation needs.

In particular, whilst a species planting schedule is indicated in the EIS, WSA requests that a condition of consent be imposed requiring WSA be consulted in the final species selection to ensure landscape species are selected that minimise bird attraction and the risk of wildlife strike.

### **Safety**

The National Airports Safeguarding Framework (NASF) has been established to manage potential development encroachment on aviation activity and minimise any detrimental impact on public health and safety. WSA supports the approach to applying NASF as proposed in the M12 on such matters as management of lighting intensity and public safety zones, as well as wildlife hazards. WSA will continue to work with TfNSW (and Department of Planning, Industry and Environment) to ensure appropriate controls are maintained.

In practical terms, WSA encourages NSW to consider an increased use of smart traffic management technology as an integral part of its safety in design and achieving safety levels as low as reasonably practicable. Similarly, it is important that the motorway lighting is not configured or be of a pattern that could distract pilots or result in the lighting being mistaken for aerodrome or runway lighting, particularly during periods of poor visibility at night or inclement weather.

WSA will continue make itself available to work with NSW on matters of mutual interest and would be happy to participate in a liaison group to ensure appropriate level of consultation.

If you have any questions regarding this submission, please contact Richard Longman, Executive Manager Planning and Engagement by email to: [rlongman@wsaco.com.au](mailto:rlongman@wsaco.com.au).

Yours Sincerely,

**Graham Millett**  
Chief Executive Officer