



Western Sydney Parklands Trust

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Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
Level 29, 320 Pitt Street
Sydney NSW 2001

Attention: **Naomi Moss**
A/Team Leader
Transport Assessments
email: naomi.moss@planning.nsw.gov.au

Dear Sir/Madam

RE: M12 Motorway (SSI-9364)

Thank you for the opportunity to comment on the application for the proposed M12 Motorway, which will provide direct access between the Western Sydney Airport at Badgerys Creek and Sydney's motorway network. The M12 Motorway will run between the M7 Motorway at Cecil Hills (to the east) and The Northern Road at Luddenham (to the west) and through a section of the Western Sydney Parklands adjacent to Elizabeth Drive.

The Western Sydney Parklands stretches 27 kilometres from Quakers Hill to Leppington covering 5,280 hectares through the three local government areas of Blacktown, Fairfield and Liverpool. The Parklands is one of the largest urban parkland systems in Australia and internationally and has an existing catchment of approximately two million people. During the 2017-2018 financial year the Western Sydney Parklands attracted about 4,000,000 visitors, with the Wylde Mountain Bike Trail and the Sydney International Shooting Centre receiving 68,712 visitors and 41,680 visitors respectively.

The RMS project team and the Western Sydney Parklands Trust (WSPT) have been working in close collaboration as RMS has progressed the concept designs for the project. This has also included associated impacts to Parkland infrastructure such as the entry precinct to the Wylde Mountain Bike Trail. The Trust looks forward to continuing to work collaboratively with RMS on the detailed design and delivery phases as the project progresses.

The M12 project will have direct impacts on land within the Western Sydney Parklands, including bushland, the M7 West Biobank site, walking trails, the Wylde Mountain Bike Trail and associated infrastructure and vehicle access to the Sydney International Shooting Centre.

WSPT supports the location of the motorway, subject to measures to ensure the motorway does not adversely impact on the ability to develop the Parklands in accordance with the *Western Sydney Parklands Plan of Management 2030* and the *Western Sydney Parklands Southern*

Parklands Framework. Section 7.3.1 of the EIS notes that these documents are relevant to the urban design, landscape character and visual amenity impact assessment. The documents are also relevant to the future land use and activation of the Parklands.

The Trust has also prepared the *Southern Parklands M12 Corridor Review* document to accompany this submission. The Trust has provided draft versions of this document to RMS as the document has developed over the last year and as the M12 Motorway design has been developed. The *M12 Corridor Review* summarises the Southern Parklands Framework, existing facilities at Wylde MTB Trail, M12 impacts to the Parklands, Design Principles for RMS consideration and entries and integration opportunities for the M12 in relation to the Parklands.

WSPT considers that some improvements to the proposal in its current form need to be made to support the long-term vision and activation of the Parklands in this area.

A summary of the recommendations for consideration to ensure positive visitor experiences and future access, development and activation of the Parklands are provided at Attachment A. These matters are consistent with WSPT's representations to RMS during project design to date. The Trust will continue to work with RMS on the resolution of these matters.

Thank you for the opportunity to comment on the application for the proposed M12 Motorway.

Sincerely

A handwritten signature in black ink, reading 'Suellen Fitzgerald'. The script is fluid and cursive, with the first name 'Suellen' and last name 'Fitzgerald' clearly distinguishable.

Suellen Fitzgerald
Executive Director
Western Sydney Parklands Trust

Attachment A – Summary of impacts and requested conditions of consent

Parklands Vehicular Access and Entry Connections

The proposed vehicular access and entry connections to the Parklands, at Duff Road and Range Road, are considered inadequate to allow for future development of the Parklands and to provide a positive arrival and visitor experience on entry into the Parklands. This area of the Parklands is planned to have 3 major Parklands Hubs – Unstructured Recreation Hub, Sport and Structured Recreation Hub and Tourism Hub, attracting up to 10 million visitors per annum in the long term.

The Trust understands that some of the matters raised in this section may relate to the Elizabeth Drive project which is currently under concept design by RMS. The Trust reiterates that both the M12 and Elizabeth Drive should be designed concurrently and delivered together if possible. There are further opportunities to improve the design of entries into the Parklands and integrate better with either the M12 or Elizabeth Drive projects. The Trust requests the opportunity to work further with RMS to resolve access matters raised below.

Duff Road

- The EIS refers to this access as a utilities access road bridge – BR11.
- The proposed Duff Road entry off Elizabeth Drive will be a future major entry point for visitors to the Parklands. As such, it is essential that this intersection be signalised (which is assumed in traffic modelling for the project), and that appropriate pedestrian, cyclist and vehicle capacity be provided when building the access bridge. It is understood that this is being developed in coordination with the proposed urban area north of Elizabeth Drive.
- This bridge should be designed as a major entry into the Parklands, not simply as a utilities access road with basic engineering design and no urban design overlay.
- WSPT continues to reiterate that the second road access at Duff Road into the Parklands needs to allow for the capacity for the future traffic demand of the Parklands' recreation and tourism land-uses such as hotel, camping and cabins, lookout, and recreational facilities and infrastructure of Cecil Hills area of Southern Parklands. The current dog-leg arrangement of only a two-lane road for accessing this precinct and future tourism and recreation hubs is a safety concern due to 'blind corners' and poor arrival experience for all future visitors to the Parklands.
- Given the difficulty and cost of developing over major transport routes the intersection and access road works of the M12 Motorway should be constructed to accommodate the development identified in the *Western Sydney Parklands Plan of Management 2030* and *Western Sydney Parklands Southern Parklands Framework*. The M12 Motorway could otherwise result in limited viability for redevelopment of this area into this emerging major Parkland destination. The area is intended to accommodate a major recreation, sport and structured recreation, entertainment and tourism destination which could receive over 10 million visits per annum in the long-term.

Range Road

- Primary access to the Cecil Hills area of the Southern Parklands will be off the intersection of Elizabeth Drive and Range Road. WSPT continues to reiterate the

requirement that this intersection should be signalised as part of the Elizabeth Road upgrade. The Transport and Traffic Report for the project does not appear to address the Elizabeth Drive / Range Road intersection.

- The Range Road bridge / underpass design is not appropriate as the future major entry to the Southern Parklands. The vehicle entry points to the Parklands should be of a high-quality design that is aesthetic, functional and modern whilst respecting the existing landscape. Range Road bridge and underpass needs to be wider, more open and create a visual sense of arrival to the Parklands and the future land-uses of the Adventure Sports and Tourism Precincts and support active travel links.
- This bridge / underpass should also consider future traffic requirements to ensure that if a widening of Range Road is required in the future that there is adequate width to allow for this widening of Range Road without impact to the arrival experience and active travel paths.
- It is noted that the public entry and exit to the Sydney International Shooting Centre and Wylde Mountain Bike Trail carpark will be impacted, as well as Gates D, E and G. A condition of consent should be imposed that requires the gate relocations to be endorsed by WSPT.

Cycle, pedestrian and connections

- The EIS states that the section of the shared user path through the Western Sydney Parklands, linking the M12 to the M7 cycleways, does not form part of the M12 Motorway project. If this proceeds, it could be implemented by the WSPT with full financial support from RMS. This link, known as the Mirror Dam Cycleway will allow cyclists to experience the changing landscape through shaded treed vistas, slices through hilly terrain and across waters of the twin dams and Liverpool Dam. Some design work has already been undertaken for this link to the Trusts design specification.

WSPT considers that a shared user path linking the M12 cycleway to the M7 cycleway should be part of the M12 project. WSPT can implement this to the Trusts widths and design specifications, with full financial support from RMS.

- As well as connecting the two major cycling facilities, the shared user path provided as part of the project would also provide access to the Range Road and Wylde Mountain Bike Trail.
- In addition to these connections WSPT considers that pedestrian / cycle connections should be considered and provided in the following locations:
 - on the vehicle connection at Duff Road (currently referred to by RMS as a utilities access road bridge BR11)
 - between the Abbotsbury Woodland to the north-east of the Elizabeth Drive / M7 intersection, and the Parklands to the south-west of the M12/M7 intersection. A cycle pedestrian pathway needs to be considered with modifications to the design of the M7 on-ramp to M12 to provide an underpass for connectivity
 - on the north-east of M7 Elizabeth Drive to create a connection into Plough & Harrow West Picnic Area of the Parklands. This should use the M12 construction haulage track with further design input required by RMS in collaboration with WSPT to achieve an agreed design outcome

- south-east of M7 Elizabeth Drive the existing cycle connection should integrate with future track connection desires down to Cecil Park shops
- south west of the M7 Elizabeth Drive a connection should link the proposed lookout on the hill near the water towers down to the intersection of the M7 and Elizabeth Drive
- The current M7 underpass could be aligned, with better design in fencing and property management, to allow for better underpass for pedestrians or wildlife or both. This underpass is a perfect example of a simple opportunity to improve permeability of the motorways.
- The current Wallgrove Road access to the M7 (located in Precinct 11 Cecil Park North) as shown by RMS as a filled road loop has major impacts to significant native vegetation and is a poor urban design outcome. RMS should investigate alternate designs for this arrangement that provide a better outcome on the biodiversity impacts and to improve the urban design outcome. In doing so, the outcome must design for suitable access to be maintained to allow wildlife habitat and movement and bushland maintenance.

Planting Design Treatment

- Planting is a significant element within the Parklands for environmental, visual, recreational and aesthetic reasons. New planting creates distinction, identifies entries and assists in developing a recognisable character for the Parklands.
- The EIS states that Urban Design and Landscape Plan (UDLP) and tree management strategy would be developed for the project. WSPT requests that conditions of consent require that these documents are endorsed by WSPT for the planting proposed within and adjacent the Western Sydney Parklands. WSPT would welcome early discussions in the preparation of this UDLP.
- The Parklands may be a place to assist with replacement tree planting to assist with Government meeting the 40% tree canopy target within the area.
- Maintenance access is required by WSPT for all vegetated sections to manage weeds and landscaping.

Corridors and Connections and Environment

- WSPT is concerned that the concept design does not provide adequate widths for actual connectivity and wildlife corridors, particularly the safe movement of macropods in the landscape. The M12 roadway corridor will be a barrier and planting of native species along the edge, whilst providing an aesthetic for road users, will not be a flora / fauna corridor or connection as stated in the design report if it is not adequately designed and managed. Further detail is required along the corridor to detail how wildlife may move through the region to key corridors and habitat and how the M12 corridor will facilitate this movement.
- The M7 underpass at Villiers Rd is the top of Ropes Creek corridor and any access or construction impacts should ensure this connection is maintained.
- Native tree planting within the corridor adjacent to the Parklands should be grown from locally sourced seed. Seed collection for the project could be undertaken within the Parkland corridor with remnant and older growth vegetated areas be considered as a higher priority to be targeted for source seed.

- The Trust requests that consideration be given to ensuring the minimum amount of Parklands is impacted by the project. This should include consideration of narrow construction and acquisition corridors and retention and management of as many existing mature, old growth trees as possible. Make good of impacted bushland should be managed by qualified bush regeneration company

Wylde Mountain Bike Trail

- The Wylde Mountain Bike Trail would be directly impacted by the siting of the project corridor, including the jump run, pump track, kids loop, sections of the three-kilometre, six-kilometre and 12-kilometre trails and associated facilities, including shelters.
- WSPT will redesign and relocate the trail with full financial support from Roads and Maritime. This will include a new road to access the facility from Range Road. Redesign and relocation of the Wylde Mountain Bike Trail will occur before the start of construction allowing access to the trails and other facilities to be maintained during construction and helping to reduce disruptions for users.
- WSPT supports this and design work has already commenced on the relocation of Wylde. The Trust looks forward to continuing to work with RMS on relocating this important community facility.

Construction Environmental Management Plan (CEMP)

- The proposal has the potential to significantly impact the physical environment, native fauna and native vegetation, and the users of Western Sydney Parklands. WSPT requests that the CEMP specifically address works within the Western Sydney Parklands, and that this part of the CEMP for Package 3 must be prepared in collaboration with and endorsed by WSPT.
- The Trust has been approached by RMS about potential compound areas within the Parklands to facilitate the construction of the M12. The Trust will consider these, subject to location and environmental impacts.