

18 November 2019

Transport Assessments
Department of Planning, Industry and Environment
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Attention: Naomi Moss, Assessment Planner - Major Projects

RE: M12 EIS (SSI-9364) – Mirvac Submission

Dear Ms Moss,

This letter has been prepared on behalf of Mirvac Projects Pty Ltd (Mircac), in response to the M12 Environmental Impact Statement (SSI-9364) that is on public exhibition until 18th November 2019.

Mircac supports the M12 project that will provide direct access between the Western Sydney Airport and Sydney's motorway network and believes the project is critical to improving road network efficiency across Western Sydney. However, Mircac would like to raise the below comments and concerns for the Department of Planning, Industry and Environment's (DPIE) consideration when assessing the M12 EIS.

The Elizabeth Enterprise Precinct

Mircac has an interest in Elizabeth Enterprise Precinct (EEP) that is located 800m from the Western Sydney Airport, north of Elizabeth Drive, Badgerys Creek. The EEP is a 244-hectare proposed employment precinct naturally bisected by South Creek which in turn creates 2 sub-precincts referred to herein as 'EEP West' and 'EEP East'.

The EEP West comprises a 113-hectare contiguous sub-precinct, containing the following lots:

- Lot 5 in DP860456; and
- Lot 741 in DP810111.

EEP East comprises a 131-hectare precinct, containing the following lots:

- Lots 1 and 2 in DP587135; and
- Lots 7, 9 and 10 in DP812284.

The locations of EEP West and EEP East are shown overlaid on the *Key features of project map* below (**Figure 1**).

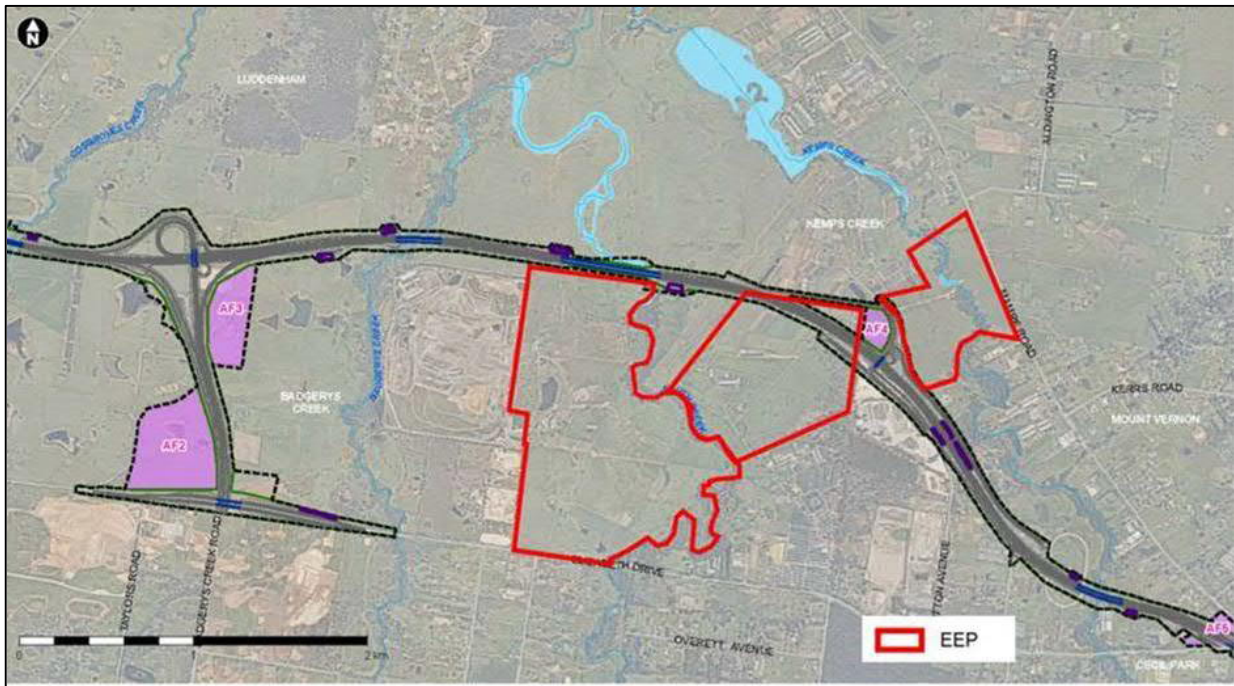


Figure 1: Key features of project map including EEP

Comments on M12 EIS

1. The M12 project does not adequately consider connectivity to surrounding employment lands and Elizabeth Drive

The EIS states:

"The project is considered essential to the State due to the role the proposed M12 Motorway would have in supporting the planned development in Western Sydney and providing access to the Western Sydney Airport, the Aerotropolis, employment lands and South West Growth Area."

Adequate consideration is not given within the EIS for the M12 to have a connection to Elizabeth Drive to provide access to the M12 for the significant employment area that is identified within the Western Sydney Aerotropolis Land Use Infrastructure Implementation Plan (the LUIIP). It is appreciated that the focus is to provide access to the Western Sydney Airport from the major motorway network; however the Government also states above that the role of the project is to provide to the Aerotropolis and employment lands.

A connection between the M12 and Elizabeth Drive needs to be considered in the EIS. It is noted that should an Elizabeth Drive / M12 Motorway connection not be provided, all traffic using the M12 Motorway would have to travel through the Airport regardless of vehicle type or destination. It is assumed that this is not a desirable outcome in terms of efficient operation of the Airport and access to and from Elizabeth Drive would provide an important alternative entry / egress point to distribute traffic. As it stands with the current design; motorists who inadvertently took a wrong turn from the M7 to M12 motorway would be forced to travel some 8km to the airport and turn around inside the airport only to return some 8km back to the M7 Motorway. A direct connection to Elizabeth Drive at both the Western Sydney Airport and Devonshire / Mamre Road intersection will be essential to provide access to the Aerotropolis and surrounding employment lands.

Further, limiting the connectivity between the M12 and Elizabeth Drive would likely exacerbate the capacity constraints at the M7 / Elizabeth Drive, which currently operates poorly. As discussed above, providing a direct connection to Elizabeth Drive, which is expected to carry a significant volume of traffic in the future, would better distribute traffic across the road network, alleviating capacity constraints at the key intersection with the M7 to the east and The Northern Road to the west.

2. The M12 project does not adequately consider connectivity to surrounding employment lands and Elizabeth Drive

To provide appropriate access to planned employment land that has been identified within the LUIIP the bridge structures and road upgrades at Clifton Avenue need to be designed for B-Triple truck movements to enable the future vehicular movements that are planned for this area.

The EIS states that the bridge proposed for Clifton Avenue is currently designed for 9 metre single articulated vehicles. Clifton Avenue is in a location that has been identified for employment land and will provide important north-south connectivity to Elizabeth Drive for employment land bisected by the M12. Therefore, it is recommended that the design for the bridge across Clifton Avenue be revised so that it can accommodate the largest vehicles expected in the area, being B-Triple trucks.

3. The M12 project does not adequately consider connectivity to surrounding employment lands and Elizabeth Drive

The EIS characterises existing land uses near the project as large rural property and identifies the EEP West and EEP East as land used for grazing and intensive agricultural land. However, the EEP West and EEP East are identified as future employment land in numerous strategic planning instruments and should be considered as such. Therefore, the impacts of the M12 project on the future employment lands should be addressed appropriately within the EIS.

It is reiterated that the proposed M12 is supported by Mirvac, who would welcome a meeting with the DPIE to further discuss the project.

Should you have any queries, please contact the undersigned.

Yours sincerely,



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