

Your Ref: Richmond Bridge Stage 2 – Review of Environmental Factors

Our Ref: HCC Submission
ECM No. 9317724

21 February 2025

The Project Manager
Richmond Bridge Duplication Project
Transport for NSW

richmondbridge@transport.nsw.gov.au

Dear Sir/Madam

Richmond Bridge Stage 2 – Review of Environmental Factors

I refer to the above-mentioned Richmond Bridge Stage 2 – Review of Environmental Factors currently on public exhibition. Council has formally considered the Review of Environmental Factors at its Ordinary Meetings on 4 and 18 February 2025 and resolved to provide comments for consideration. Council does not consider this its final commentary on the Review of Environmental Factors (REF).

Council does not endorse the project as presented. We have serious concerns that the project does not alleviate traffic congestion and may have an adverse impact on flood behaviour.

In reviewing the Review of Environmental Factors, Council wishes to raise a series of significant issues that require attention and additional information.

Council requests the following:

- A further opportunity to make a submission on the REF after further information, as requested below, is available:
 - Heritage Impact Assessment addressing the Macquarie era cultural heritage landscape, William Cox built road and original 1820 stock route, and the State Heritage listed items Mountain View, Hobartville and St Peter's Church Group
 - Studies pertaining to additional structures placed within the floodplain, and consequential impacts on flood behaviour on upstream, downstream and residential communities in the vicinity
 - Details of costing for Stage 2B
- Further direct consultation with impacted residents in the vicinity of the proposed route, and any further options considered
- Consideration of an alternate route directing traffic to The Driftway other than via Southee Road
- That a review be undertaken with regard to Stage 2B Bells Line of Road Upgrade (Section 1) in relation to the T Intersection in North Richmond given that the car parking that already exists in the four-lane part of Bells Line of Road to potentially maintain the status quo of that section
- That the bridge on Bells Line of Road over Redbank Creek be widened to four lanes.



Council demands:

- That any project be delivered in full, not sub-staged when the costs and timing to deliver the project in its entirety are unknown, and adverse costs and impacts must be borne by the community until project completion
- A flyover at the intersection of Kurrajong Road, Yarramundi Lane and Old Kurrajong Road in lieu of an at-grade intersection
- Clarity for Council and the Hawkesbury community in terms of timing and costs associated with sub-staging
- Greater thought to be given to the impacts on residents, and how to mitigate or avoid those impacts
- That decisions relating to the bridge and approaches seriously consider flood resilience which, based on recent experiences, is front of mind for Council and the Hawkesbury community, and the ability for this proposed infrastructure to deliver a higher flood immunity for the bridge and approaches
- A better outcome for the Hawkesbury community and what was originally promised with the announcement of the project, as opposed to a project that has been significantly diluted since the investigations commenced
- Provision of infrastructure that is future proofed for decades in terms of traffic improvements, flood mitigation and safety improvements
- Avoid use of roads currently with a 50km/h speed limit being converted to an 80km/h speed limit (Inalls Lane and Southee Road in particular) without appropriate traffic improvements and mitigation of the impacts
- Consideration of the impacts on Council controlled roads in terms of increased maintenance and use of these roads
- Consideration and details of measures to address safety concerns regarding entrance and exit points from side roads to Southee Road.

As the project currently stands, Council and the Hawkesbury community considers that it represents a By Pass to a T intersection on a semi rural road, and both Council and the Hawkesbury community demand a better outcome.

Council's primary concerns relate to the staging of Stage 2 of the project into Stage 2a; containing the Bypass and the bridge, and Stage 2b; containing upgrades to Southee Street and Bells Line of Road, due to insufficient funding for the entire project.

This staging is a significant concern given the potential for delays in delivering Stage 2b due to not having committed funding. This is especially so given the proposed interim measures between Stage 2a and 2b, and in particular the roundabout at Castlereagh Road and Inalls Lane which then feeds all traffic directly into the existing Southee Road, and not a duplicated Southee Road. Council has significant concerns in respect to the proposed sub-staging, and the high potential for lengthy delays and uncertainty eventuating. These concerns include:

- Significant concern with the potential for ongoing impacts to the residents and the local character with the existing road having to sustain the increased volume of traffic for an unknown period of time
- Seeking an indication of what the costs are to deliver Stage 2b so that the community has an understanding of the additional funding required to deliver the whole project



- Impacts to Council controlled roads such as Southee Road, as a consequence, and the increased maintenance and damage from higher traffic volumes and especially with heavy vehicle movements
- Potential for congestion as a consequence of the proposal, and delays to Stage 2b with the provision for a four lane bridge, but not providing the lanes for that traffic to move into, particularly Bells Line of Road including the need to widen Bells Line of Road at the Redbank Creek Bridge due to the existing narrow carriageway and height of the current bridge.

Given the insufficient funding, Council is deeply concerned that items designated to be delivered in Stage 2b will be delayed, and that the interim measures between Stage 2a and 2b are not adequate to manage increased traffic, particularly Southee Road. Accordingly, Council stresses the need for funding to be secured for stage 2b as an urgent priority.

Council also wishes to raise the following additional comments in relation to the project:

Strategic Context

Council is partially satisfied with the assessment of the project against relevant state strategic plans and regional and local infrastructure plans as identified in Council's submission to the Preferred Option Report dated 17 September 2021 (2021 Submission) including:

- Greater Sydney Region Plan and Western City District Plan 2018
- Future Transport Strategy
- Grose River Bridge.

However, the assessment of the project against the Resilient Valley Resilient Communities – Hawkesbury-Nepean Valley Flood Risk Management Strategy is still considered to require further assessment. To ensure disaster resilience and that flood risk management is at the forefront of all infrastructure planning decisions, Council urges the assessment of this project against this Strategy.

Additionally, to provide a greater understanding of plans related to regional connectivity, clarification should be provided in terms of the project's connection to the alignment of the 1951 Castlereagh Corridor which terminates at Springwood Road.

With approval being given to the Grose River Bridge in December 2024, and a pathway to delivery of that infrastructure item, Council's concerns raised in the 2021 Submission regarding the risk to the project of the Grose River Bridge not proceeding is largely resolved but only if the project is undertaken in its entirety. With both critical infrastructure items proceeding, traffic demand is able to be dispersed across the additional river crossings, and both projects will benefit from the upgrades to The Driftway as Stage 1.

Funding and Timing

Council is highly concerned that insufficient funding is available to deliver the entire project, requiring the splitting of Stage 2 into 2a and 2b, with Southee Road and Bells Line of Road Upgrades currently being unfunded. This concern is centred around the potential for delays caused to these aspects of the project, and unsatisfactory interim measures in the circumstance that these delays are prolonged if funding isn't secured immediately.

Further, as a Council asset, through the increased traffic flow and heavy vehicle movements over Southee Road due to the staging, Council would be required to cover the cost of maintenance and repair of damage cause by the increased movement. In the interim should there be significant delays in completing the Southee Road duplication, Transport for NSW should cover the cost of the maintenance and repairs for Southee Road.

Additionally, Council wishes to stress that without the completion of Stage 2b works, Council urges Transport for NSW to secure funding for the entirety of the project as a priority, including consideration on whether contributions collected from the NSW Government's Housing and Productivity Contribution



can be used to support this project. Further it is requested That Transport for NSW provide a cost estimate for the works that are proposed to be delivered in Stage 2b.

Socio-Economic and Community Impacts

Appendix K 'Socio-economic Impact Assessment to the Richmond Bridge Stage 2 Review of Environment Factors' identifies a moderate degree of impact to the local Polo Industry and Active Open Space Facilities such as Colo Soccer Fields both during construction and ongoing after the completion of the new bridge and bypass route. Despite this acknowledgement, there is little discussion given or assessment of mitigation options to limit this impact. Council requests further consideration into this identified impact, in addition to clarification in terms of the indicated business community sector support for use of the existing Bells Line of Road corridor through Bells Line of Road.

In respect to residential areas that may be impacted by this project, including Southee Road and Inalls Lane, Council is partially satisfied with the mitigation measures. For Southee Road, locating the duplication behind the tree line on Western Sydney University land, with a vegetated mound buffering noise and other environmental pollutants from the residential area mitigates many of the adverse impacts of the project. However mitigating measures on Inalls Lane are consider to be lacking. Council requests further consideration into measures to mitigate the negative impacts on these residential areas in the detailed design process.

Council has identified the need for the assessment of the socio-economic impact of the staging of Stage 2 on Southee Road in respect to the interim arrangements of diverting traffic onto the existing road until the duplication of Southee Road is complete. This assessment needs to consider the impacts on the scenario of delays in delivering Stage 2b in respect to noise and environmental pollutants exposure, and resident's access issues that may result due to the increased volume of traffic.

Flood Resilience

Whilst Council acknowledges that the Bridge and approaches are to be delivered at the 1 in 20 year flood height (raised from the 1 in 5 year flood height included in the Preferred Option Report of June 2021), Council still advocates for a higher flood immunity for the project.

For the Hawkesbury community, flood resilience is front of mind, and as such there is a need to consider a higher flood immunity for the bridge and approaches. Additionally clarification in terms of floodplain impacts and that the raised embankments will not increase flooding.

The Draft Hawkesbury Floodplain Risk Management Study 2025 (informed by the Hawkesbury-Nepean River Flood Study 2024) identifies the significant raising of flood levels for various frequencies over time due to the effects of Climate Change. To ensure the long-term effectiveness of the project, Council advocates for the Bridge and the various approaches to be built with consideration of future flood levels and frequencies.

Flooding During Construction

Council supports the consideration of environmental safeguards in the chance of flooding during construction. However, based on the information provided in respect to the development of a Flood Management Plan and management measures, it is encouraged where possible to locate stockpiles above the 5 per cent AEP level instead of the 10 per cent AEP due to the depth, velocity and frequency of floods at this level.

Heritage Consideration

Whilst it is noted that consideration of local heritage for the project is included as provided in Appendix I – Statement of Heritage Impact, there are a number of matters of significant concern to Council relating to heritage considerations.



It is considered imperative that the Statement of Heritage Impact should also consider and assess the impacts on:

- Pre Macquarie cultural landscape
- The sightlines for Richmond as a Macquarie Town, including the historical link between the residential properties (town lots on the higher ground) and the associated agricultural land on the lowlands
- 1820 Stock Route
- Heritage items as a consequence of vibration during construction, and operation.

In respect to key state heritage items within the project areas including Hobartville Stud (SHR 00035) and Mountain View (SHR00044 – corrected from Transport for NSW documentation), Council supports the conclusion that an individual Statement of Heritage Impact will be needed for the respective items in lodging a Section 60 approval for major works. Council encourages that these Statement of Heritage Impacts should also consider the heritage considerations above in order to provide a wholistic assessment and consideration of tangible and intangible heritage values.

Of significant concern to Council is the state heritage listed item Mountain View (also known as Dight's Farm and Durham Bowes) on Inalls Lane. This item being constructed in the early 1800's is of paramount importance on a state level. It's state heritage listing refers to its 'exceptionally high significance' and 'remarkably intact' condition. Whilst it is noted that no acquisition is proposed of this site, its untouched condition, and very early construction techniques using soft bricks and lime mortar, make it extremely vulnerable. Further, it's setting 'overlooking the lowlands farms', is now an extremely rare example of Governor Macquarie's town planning and placement of rural homesteads, perhaps one of the last rural colonial landscapes left in Australia. Therefore, the item is considered to be susceptible to significant impacts associated with both construction (noise and vibration) of the preferred corridor, and traffic movements following completion of the project, and loss of views, setting and context. It is understood that no condition assessments have been undertaken on this item to help inform further detailed planning and design.

Council strongly recommends further detailed assessment of the potential impacts of the preferred corridor option on this state heritage listed item.

Notification of Affected Property Owners

Community members have raised concerns with Council in terms of the notification of affected property owners, which given the impacts from the project should have been notified on a much wider basis. Additionally, reports of sporadic notification amongst the community has been highlighted to Council, and as such it is considered that Transport for NSW engage with the broader community in a consistent manner. To that end, Council highlights the need for a community information session in Richmond or Hobartville to ensure that residents east of the Hawkesbury River have the opportunity to attend and provide feedback.

Active Transport

Council commends the consideration and inclusion of active transport links within the project. The retention of the existing bridge for pedestrians and cyclists provides much needed multi-modal connectivity between Richmond and North Richmond and promotes the river as a key destination and a cultural anchor for the Hawkesbury, consistent with priorities of the Community Strategic Plan 2022-2042 and the Hawkesbury Local Strategic Planning Statement 2040. However, Council wishes to emphasise pedestrian safety consideration through these active transport links which will largely be located adjacent to high traffic transport corridors, even with the construction of the bypass.

Council reaffirms its position of not wishing to inherit ownership and maintenance of the existing bridge after the completion of the duplication and conversion into a shared pedestrian and cyclist bridge. As the existing bridge is currently a State Government asset, it should remain in the ownership of Transport for NSW after the conversion, and not become a Council asset. If it remains a State Government asset, further clarification is sought in respect to the shared used paths leading onto the bridge in respect to the ownership and responsibility for maintenance.

Detour Routes

Concerns have been identified with planned detour routes for pedestrians and cyclists during the construction of the bridge. Under the planned routes proposed in the Review of Environmental Factors, pedestrians and cyclists are detoured after crossing the existing bridge through Hanna Park and to Shortland Close through to Flinders Place, Pitt Lane and Riverview Street as identified in Figure 1.



Figure 1 – Pedestrian and Cyclists Detour Routes

Much of the length of the pedestrian detour is currently unpaved and poorly lit. Relying on this as a pedestrian and cycling route has issues with the principles of Crime Prevention Through Urban Design (CPTED) and has limited accessibility for those with a disability or mobility impairment. Should this become the detour path during construction, a shared path should be constructed prior to the detour route becoming active, with appropriate lighting, to ensure that this area is able to properly function safely and equitably as a detour route.

Urban Greening

The Review of Environmental Factors identifies sustainability opportunities for responding to climate change through an investigation into the feasibility of preparing a corridor greening strategy. Council supports and would be willing to collaborate in the development of this strategy. Council encourages the consideration of Hawkesbury City Council's Urban Greening Strategy and also Penrith City Council's Urban Green Grid Strategy which identifies The Driftway; one of the approaches to the bypass, as a corridor for the City-Wide Green Grid.

Acquisition and Engagement with Affected Property Owners

Reiterating concerns raised in the 2021 Submission, Council wishes to highlight that previous corridor planning as undertaken by Transport for NSW (in particular the 2018 Bells Line of Road and Outer Sydney Orbital corridor proposals) was problematic for the affected community. As such, Council encourages high levels of meaningful communication when dealing with affected property owners, particularly where acquisition is required.

Suggested Improvements and Clarification from 2021 Submission

Council's 2021 submission suggested the following improvements to the preferred corridor:

- Consideration of a flyover at Kurrajong Road to avoid an at-grade intersection with the bypass



- Consideration of a corridor route that minimizes impacts, and balances against traffic efficiency including provisions that minimizes the number of 90 degree bends and provides for less interruption of traffic flow.

The final route still includes an at-grade intersection at Kurrajong Road, providing a 90 degree bend for the primary traffic flow. While budget and site constraints likely limit the ability to completely incorporate these recommendations, it is identified that as consequence, the intersection of the bypass and Kurrajong Road has the potential to be a traffic choke point in the corridor.

Thankyou for the opportunity to provide a submission into the Review of Environmental Factors for Richmond Bridge Stage 2. Council wishes to work closely with Transport for NSW in delivering this key infrastructure item and welcomes ongoing communication and discussion in respect to this project.

Yours faithfully

Elizabeth Richardson
General Manager | Hawkesbury City Council
☎ (02) 4560 4444