Dominic Crinnion
Team Leader
Social and Infrastructure Assessments
Department of Planning, Industry & Environment
GPO Box 39
Sydney NSW 2001

Attention: Daniel Gorgioski – Senior Planner

Dear Mr. Crinnion

St Marys Intermodal, Forrester Road, St Marys (SSD-7308)
Notice of Exhibition

Thank you for your email letter dated 28 May 2019 inviting Transport for NSW (TfNSW) to comment on the subject State Significant Development (SSD) application.

This submission is in conjunction with the submission provided by the Greater Sydney Division at TfNSW dated 1 July 2019 (ref: SYD15/01627/04).

TfNSW has reviewed the relevant documentation within the exhibited Environmental Impact Statement (EIS) and provide comments in **Attachment A**. A suggested condition has been provided in **Attachment B**, however it is noted that further conditions could be suggested following the Applicant's Response to Submissions.

Furthermore, the interaction of the proposed freight hub with Port Botany will require that the Applicant will need to work with stevedores at the port to facilitate the efficient movement of empty containers to the port by rail.

If you require any further information regarding this matter and wish to discuss, please do not hesitate to contact Ken Ho, Transport Planner, via email, at ken.ho@transport.nsw.gov.au.

Yours sincerely

5/7/2019
Mark Ozinga
Principal Manager, Land Use Planning & Development
Customer Strategy & Technology Division

Objective reference: CD19/04405

Attachment A: Comments on the St Marys Intermodal SSD application (SSD 7308)

Western Sydney Corridors

Comments

In March 2018, TfNSW exhibited recommended corridors for Western Sydney, including the Outer Sydney Orbital (OSO) and the North South Rail Line (NSRL). Coinciding with the announcement, the DPIE released a discussion paper proposing a SEPP to protect Western Sydney Corridors. The proposed SEPP, under Section 3.14(1)(c) of the *Environmental Planning and Assessment Act 1979*, identifies the land required for future infrastructure projects in Western Sydney including the OSO and NSRL.

It is noted that the proposed St Marys Freight Hub is within the exhibited corridors of both the OSO and NSRL.

The summary of the discussion points from the meeting on 29 November 2018 are noted. It is advised that the comments provided were general in nature and any detail on final alignment, elevations and corridor boundaries will be subject to detailed design.

The principles proposed in Section 9.2.4 of the EIS (p. 81) to ensure that both the OSO and Freight Hub can exist without significant disruption are supported.

The stated principles were as follows:

- Limit all loading/unloading of trains to the loading area in this proposal.
- Maintain ongoing consultation and communication with TfNSW regarding the design and delivery of the OSO project.
- Ensure future buildings and structures maintain adequate vertical and horizontal separation to the OSO.
- The full functionality of the rail corridor is to be maintained for its full length within Pacific National's parcel of land.

Recommendation

In order to maintain the integrity of the transport corridors, all parties are requested to work closely with DPIE to minimise the impact of the development on the proposed corridors.

Back-loading rate – sensitivity analysis

Comments

The Traffic and Transport Assessment (Bitzios, March 2019) has assumed a 100% back-loading rate (i.e. all heavy vehicles will carry containers in both directions; none will return with no container). Any empty running when picking up a full or dropping off an empty container will result in daily truck movements greater than 436 trucks/day.

Recommendation

It is requested that the Applicant undertake a sensitivity analysis on the traffic generation calculations based on less than 100% back-loading rate (potentially a step analysis that considers 60% and 80% back-loading rates). This sensitivity analysis would assist DPIE in assessing the potential impact on the road network should the stated back-loading rates are not achieved in the operation of the facility.

Noise assessment

Comments

Section 6.2.4 of the Noise and Vibration Assessment (AECOM, March 2019) describes the rail noise sources that were modelled. However brake squeal, wagon bunching and curve squeal has not been assessed.

The Freight Access and Performance Branch at TfNSW have previously measured noise from Pacific National freight trains accessing the existing siding at St Marys. Observations indicate that brake squeal was audible as the train was stopping. Furthermore, a number of noise complaints have been received from residents in Camira Street and Kalang Avenue, specifically relating to loud squeal noise from freight trains in the siding.

Section 6.6.1 of the Noise and Vibration Assessment states that six (6) properties on Kalang Avenue would qualify for at-property noise treatments, however, it is unclear whether other properties in catchment NCA02 also qualify for noise mitigation, including dwellings along Camira Street.

Finally, the EIS and Noise and Vibration Assessment does not commit to use of best practice wagons for their port shuttle service in line with other Intermodal Terminal (IMT) approvals. The following is suggested to DPIE to be made as standard IMT requirements (including St Marys):

- best practice noise control on their proposed port shuttle, including wagon steering to minimise wheel squeal and electronically controlled pneumatic braking systems;
- permanent noise monitoring systems with associated reporting and provision of digital data records to the Secretary;
- provision of angle of attack wayside monitoring with associated reporting and provision of digital data records to the Secretary; and
- policies and procedures that demonstrate acceptance, monitoring and reporting on locomotive and rolling stock's performance communicated to operators using the St Marys Freight Hub.

Recommendation

It recommended that the Applicant:

- assesses noise from brake squeal, wagon bunching and curve squeal from trains using the siding to access the proposed St Marys Freight Hub.
- updates the Noise and Vibration Assessment to provide justification as to why other properties in catchment NCA02 would not be eligible for noise mitigation measures.

Attachment B: Suggested Condition

Note: Further conditions could be suggested following the Applicant's Response to Submissions.

Noise contour data

Suggested condition:

The Proponent shall supply the DPIE with the LAeq(period) and LAFmax noise contour data for the entire project in an electronic format suitable for input to a GIS.

Reason:

This data would be used to inform future strategic planning for the area with relation to noise.