



Australian Government
Department of Defence
Estate and Infrastructure Group

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Attention: Lauren Rose
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Rose,

RE: ENVIRONMENTAL IMPACT STATEMENT (EIS) ASSOCIATED WITH THE PROPOSED MOOREBANK AVENUE REALIGNMENT (THE ‘PROJECT’)

The Department of Defence (Defence) received notification of the Environmental Impact Statement (EIS) associated with the proposed Moorebank Avenue Realignment and acknowledges that the proposal includes the realignment and upgrade of the existing Moorebank Avenue from South of Anzac Road to the East Hills railway, running predominantly to the East of the Moorebank Precinct East site, located in the suburbs of Casula, Moorebank and Holsworthy, New South Wales (‘the project’). Further to the Defence comments on the Planning Secretary’s Environmental Assessment Requirements (SEARs) associated with the project, Defence would like to make further comments on the EIS.

Defence recognises the importance of the broader Moorebank Intermodal Terminal (MIT) to achieve significant national productivity improvements by a road-to-rail modal shift. Defence is conditionally supportive of this project in context of the broader MIT development. Defence has reviewed the project and seeks to ensure that the potential impact of the project on Defence operations, property and associated infrastructure is fully considered as part of the formal planning process.

The engagement to date with the relevant Moorebank parties on the Defence Scoping Report and SEARs process provided a more mature understanding of potential negative impacts on Defence land and assets. Defence advised in the SEARs that the current assessment process specifically consider the opportunity for alternative alignments which minimise, or ideally totally avoid, any impact on the existing Defence services corridor.

Further to previous advice, Defence has concerns the proposal would have a significant level of disruption to Defence land and operations. The proposal includes relocation of Defence utilities within the construction corridor and the closure and relocation of the Joint Logistics Unit – East (JLU-E) Base entrance. The EIS provides no detail of staging, impacts or alternative options. The EIS requires more detail on the issues raised on the project, as set out below.

Defence Property Impacts

The current design of the project requires the divestment of Defence land at JLU-E to accommodate the proposed roadworks. Defence operations, property, infrastructure services and assets will be impacted by the project and will need to be addressed with demonstrated mitigation measures through the planning process and EIS.

Required Planning Definition for Defence

Defence considers that the EIS does not provide adequate detailed plans or supporting information to determine accurate impacts on Defence land, the ancillary infrastructure requirements or the proposed mitigation measures.

Mitigation measures will need to be defined and based on appropriate planning and engineering assessments, including plans of sufficient detail to identify and address Defence requirements and constraints associated with the project, including but not limited to the following:-

- New Defence Entry Precinct and associated requirements;
- Fully compliant stormwater, sewerage, water, roads, fire services, earthworks, fencing, electricity, gas and telecommunications infrastructure replacements;
- Easements or property requirements, including any resolution or release from any deed or caveat;
- Appropriate security arrangements;
- Noise and vibration management measures;
- Re-purposing and remediation of assets associated with the existing entry;
- Traffic management measures, including decanting strategy, safety analysis and the mitigation measures for Defence operational impacts;
- Landscape treatments in open space and the road reserve;
- Design interface between JLU-E and adjoining landowners consideration;
- Consideration of proposed electricity upgrades at the site, including the 33kv line to Holsworthy Barracks and any substation expansion i.e. the Anzac Village Zone;
- Environmental clearances associated with any clearing required for relocation of Defence utilities;
- Design that minimises the impact to Defence property.

Utilities Plan

Defence considers that the EIS does not address the management of the utilities impacted by the proposed road. Defence has a range of power, communications and water utilities that are impacted by the proposal that require detailed consideration.

Table 5.7 of the EIS suggests that the services will be buried or relocated. Due to the sensitive nature of the utilities in this area, Defence requests further detail of the plan for these utilities on how this will be addressed during the construction phase and end state, including Defence access, maintenance and security requirements.

Consequential Land Impact – Defence Utilities

Defence would like to understand the specific plan for utilities relocation to meet the relevant requirements, including the land provision for these relocated services.

Relocation further to the East would require increased land take of Commonwealth land and impact additional Defence assets, which does not appear to be provided for in Figure 5.7 of the EIS. Relocation to the West may place the services outside of Defence controlled property.

Consequential land impacts - Defence JLU-E Entrance

The EIS states in Figure 5.12 that the entrance to the JLU-E is assumed to be relocated to Anzac Road, which requires agreement with Defence. As such, the EIS does not have the appropriate detail to consider the impacts should the entrance be required to remain in-situ, including the traffic management and mitigation measures of this option.

Defence requires detailed consideration of the traffic impacts of the project and the functional requirements of Defence at the JLU-E entrance. Defence needs to understand the traffic and operational impacts of remaining in-situ at Moorebank Avenue and/or relocating to Anzac Road, including queue length and turn back options with consideration of lock down options according to Defence SAFEBASE Security requirements. The project will also need to demonstrate mitigation measures over the construction phase and staging to ensure adequate JLU-E access and security is maintained at all times.

Should you wish to discuss the content of this advice further, my point of contact is Mr Benjamin McLean, at benjamin.mclean3@defence.gov.au or via the Defence land planning group inbox at land.planning@defence.gov.au.

Yours sincerely



 **Pat Sowry**
Assistant Secretary Estate Planning

13 April 2021