NSW GOVERNMENT Transport for NSW

PCU060599

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Andrew Beattie

SIMTA Stage 1 – Intermodal Terminal and Rail Connection

Dear Ms McNally Carolyn.

Thank you for your letter received 29 May 2015 inviting Transport for NSW (TfNSW) comment on the State Significant Development Application for the Sydney Intermodal Terminal Alliance (SIMTA) facility at Moorebank.

Please be advised this response and annexure reflects input from Transport for NSW, Roads and Maritime Services (Roads and Maritime) and Sydney Trains and represents the combined response of the Transport Cluster.

On 4 June 2015 a wholly Commonwealth Government owned business enterprise, the Moorebank Intermodal Company Limited (MICL), entered into an agreement with SIMTA to develop their combined landholding of 241 hectares as an intermodal facility. TfNSW looks forward to working with Department of Planning and Environment to ensure that assessment and conditions for the subject State Significant Development stage are a step towards an optimal outcome for the whole precinct.

In summary, the key issues from the Transport Cluster perspective are:

- The proposed SIMTA rail freight line onto the East Hills Rail Line Corridor is not supported. The alignment of the freight rail connection should therefore be modified to avoid the East Hills Rail Line. Sydney Trains would consider granting conditional access to the other land parcels owned by Sydney Trains, the Southern Sydney Freight Line within the Main South Line Corridor and the proposed Moorebank Station lands subject to the proponent entering into satisfactory commercial arrangements;

- TfNSW requests that the proponent be conditioned for works that will allow bus services to the precinct to be provided;

18 Lee Street Chippendale NSW 2008
PO Box K659 Haymarket NSW 1240
T 8202 2200 **F** 8202 2209
www.transport.nsw.gov.au
ABN 18 804 239 602

- TfNSW requests that a comprehensive vehicle monitoring regime be developed and implemented to clearly understand the relationship between shipping containers received by this development and traffic (private vehicles and commercial vehicles) generated on the road network. This will assist any future development application for terminal expansion to 500,000 TEU and other development applications for the site; and

- TfNSW does not consider the mitigation measures proposed in the proponent's draft Statement of Commitment as supporting the expansion of the facility from 250,000 to 500,000 twenty foot equivalent shipping containers (TEUs). Further work is needed and Roads and Maritime is currently developing a comprehensive traffic model that could be used to inform future development applications on this site.

Other issues are also detailed and addressed in the attached annexure.

The Transport for NSW contact officer is Tim Dewey, Senior Transport Planner who may be contacted on 8202 2188 or alternatively by email at Tim.Dewey@transport.nsw.gov.au

Yours sincerely

15/7/15

Anissa Levy
Deputy Director General, Planning

CD15/08334
CD15/09901

Annexure - SIMTA Stage 1 – Intermodal Terminal and Rail Connection

Acronyms

SEAR	Secretary Environmental Assessment Requirements
EIS	Environmental Impact Statement
MICL	Moorebank Intermodal Company Limited
SSFL	Southern Sydney Freight Line

SEARS Requirements for Rail

Rail	SEARS Requirements
	SEAR: Addressing the requirements of TfNSW including; *a) Detailed design and engineering drawings for the rail link, including the freight line track , supporting infrastructure and clearances with the East Hills Passenger Line and the relocation of any Sydney Trains services and infrastructure, prepared by an Asset Standards Authority Authorised Engineering Organisation;* *b) Identifying the forecast annual train movements including an estimated range of daily train movements, and the capacity of existing and proposed rail network to handle predicted increases in traffic, based on appropriate empirical evidence and modelling; and* *c) Demonstrate how the use of the proposed Moorebank Station site would ensure priority access by Sydney Trains at all times.*

Access to the East Hills Line Railway corridor

Issue:

Access to the East Hills Railway corridor is declined. The reasons include:

- The impact to Sydney Trains services while construction works to relocate the significant services buried in the corridor are relocated and construct the freight link are in progress;
- Preliminary Engineering advice indicates that the provision of the SIMTA rail link within the East Hills Corridor will trigger the need to upgrade the Moorebank Avenue bridge in order to meet current derailment standards; and
- The freight line would restrict the options for future amplification of passenger train services in the corridor.

The alignment of the proposed freight link should be modified to completely avoid the East Hills Rail Line corridor.

Recommendation:

It is requested that the proponent modifies their application to make alternative arrangements for freight rail access to their site.

SEARS Requirements for Traffic and Transport

Traffic and Transport	SEARS Requirements
	SEAR: A Traffic Impact Assessment that assesses intersection and road network impacts, including impacts on Cambridge Avenue. The traffic assessment shall: *a) Take into account the Guide to Traffic Generating Development (RTA);* *b) Undertake a realistic and justified range of peak hour generation scenarios (to be determined in consultation with TfNSW);* *c) Undertake detailed model analysis to confirm network operation and identify intersection upgrade requirements;* *d) Consider the constructability constraints of proposed upgrade(s) at key intersections , such as vehicle sweep paths, geometry and sight lines;* *e) Assess construction traffic impacts, including: i. the identification of routes and the nature of existing traffic on these routes; ii. an assessment of construction traffic volumes (including spoil haulage/delivery of materials and equipment to the road corridor and ancillary facilities); and iii. potential impacts to the regional and local road network (including safety and level of service) and potential disruption to existing public transport services and access to properties and businesses.* *f) Assess operational traffic and transport impacts to the local and regional road network, including: i. changes to local road connectivity and impacts on local traffic arrangements, road capacity/safety; ii. traffic capacity of the road network and its ability to cater for predicted future growth; and iii. monitoring of vehicle numbers on Cambridge Avenue.* *g) Give consideration to the use of heavy vehicles able to move two 40 foot containers;* *h) Provide an outline operational Traffic Management Plan to manage vehicle movements to and from the site, including contingency measures should the M5 and Moorebank Avenue be obstructed.* *i) Provide an updated Traffic Management and Accessibility Plan including: i. measures to prevent heavy vehicles accessing residential streets to maintain the residential amenity of the local community ii. public transport; iii. cyclist facilities; and iv. driver code of conduct.* *In particular, the Traffic Impact Assessment must identify upgrades and other mitigation measures required to achieve the objective of not exceeding the capacity of the following intersections and roads:* *a) Moorebank Avenue/Newbridge Road;* *b) Moorebank Ave/Heathcote Road;* *c) Cambridge Ave;* *d) M5 Motorway/Moorebank Avenue;* *e) M5 Motorway/Heathcote Road; and* *f) M5 Motorway/Hume Highway.*

Cumulative Impacts on road network during Operation.

Issue:

Section 5.10 of the Hyder Traffic Impact Assessment report provides information and assessment of cumulative impacts of the two proposals during operation in 2016. Moorebank Intermodal Terminal's 2015 Early Works Phase was considered for this assessment which is not consistent with the development profile for the precinct. Therefore, the report provides incorrect cumulative analysis for 2016.

Recommendation:

The following condition is requested:

- *The proponent amends their cumulative traffic analysis (during operation) for the year 2016 to include the Moorebank Intermodal Terminal's Project Phase A – 2016. The amended analysis should then be presented to TfNSW and Roads and Maritime for endorsement.*

Traffic Analysis

Issue:

Section 5.4 of the Hyder Traffic Impact Assessment provides intersection analysis results for the intersections of Moorebank Avenue / Newbridge Road and Moorebank Avenue / Heathcote Road with and without Stage 1 scenarios in 2016. However, this analysis has been undertaken for the upgraded intersection layouts instead of existing intersection layouts. Improvements for these intersections currently have no funding commitment.

Recommendation:

The following condition is recommended:

- *Additional analysis should be undertaken for the current lay out of intersections of Moorebank Avenue / Newbridge Road and Moorebank Avenue / Heathcote Road for the with and without Stage 1 scenarios in 2016 and the results provided to TfNSW and Roads and Maritime for endorsement.*

Intersection design and queuing

Issue:

The Stage 1 proposal proposes a new single signalised access arrangements on Moorebank Avenue which is inconsistent with the approved Concept Plan access arrangements. Roads and Maritime requests additional information to be provided to enable determination of whether this is acceptable modification. TfNSW therefore requests the following condition.

Recommendation:

The following condition is requested:

The proponent provides the following additional information / details to TfNSW and Roads and Maritime for further review and comment:

- *Further information should be provided justifying that the proposed access arrangement and location is the most favourable.*
- *Further traffic modelling information indicating phasing details, the extent of traffic queuing on all approaches to this proposed new signalised access (Location A) along with details regarding the intersection design, the configuration and length of Moorebank Avenue (northbound) being provided as 2 (two) travel lanes (prior to and after this intersection). Note: This is to ensure that trucks would not be expected to return to a single lane within a short distance on the departure;*
- *Further technical information to demonstrate that there is adequate on-site truck storage between the proposed new signalised intersection and the truck processing gates to ensure that traffic flows along Moorebank Avenue are not unduly impeded (i.e. extent of truck queuing based on processing time to pass through gate, etc);*
- *Further technical information which demonstrates that the processing gates / storage for egressing trucks is located far enough within the site to ensure that the signals don't "gap-off" when there is a green phase for trucks leaving the site; and*
- *The proponent should undertake the above work considering traffic generated by the Proposed 250,000 TEU; and a site access Master Plan design based on the likely maximum SIMTA IMEX TEU (i.e. 1 Million TEU).*

Traffic Signal decommissioning

Issue:

The proponent proposes to decommission traffic signals along Moorebank Avenue. Roads and Maritime requires that this occur at no cost to government.

Recommendation:

The following conditions are requested:

- *The proponent is to:*
  - *Bear the full costs associated with the decommissioning / removal / disposal of the traffic signals and associated equipment;*
  - *Consult with Roads and Maritime's Network Operations - Consult with Roads and Maritime's Contract Management Office - regarding the processes to follow for the removal and disposal of the traffic signal equipment, isolating the power supply, and updating the PC inventory; and*
  - *Ensure signal decommissioning occurs prior to the proposal being operational.*
  - *Roads and Maritime Network Operations contact is Steve.ACREMAN@rms.nsw.gov.au and the Contract Management Office contact is Gary.HADFIELD@rms.nsw.gov.au*

Installation of new or modification to existing Traffic Signals

Issue

The proponent proposes installation and/or modification to existing traffic signals. Roads and Maritime requests the proponent to enter into a WAD prior to the works being undertaken.

Recommendation

The following conditions are requested:

- *The construction of new or modification to existing traffic signals along Moorebank Avenue shall be designed to meet Roads and Maritime requirements. The Traffic Control Signal (TCS) plans should be drawn by a suitably qualified person and endorsed by a suitably qualified practitioner;*
- *The submitted design shall be in accordance with Austroads Guide to Road Design in association with relevant Roads and Maritime supplements (available on www.rms.nsw.gov.au). The certified copies of the signal / civil design plans shall be submitted to Roads and Maritime for consideration and approval prior to the release of a construction certificate by the Principal Certifying Authority or Council and commencement of road works;*
- *Roads and Maritime fees for administration, plan checking, civil / signal works inspections, funding of the maintenance costs for new traffic control signals for the first ten years of operation and project management shall be paid by the developer prior to the commencement of works; and*
- *The proponent is required to enter into a Works Authorisation Deed (WAD) for the abovementioned works. Please note that the WAD will need to be executed prior to Roads and Maritime assessment of the detailed signal / civil design plans.*

Issue

The applicant does not make provision for Roads and Maritime to access and maintain the traffic signals proposed by the proponent.

Recommendation

The following condition is requested:

- *The proponent creates an easement or dedicates land as public road within their site at the traffic signals to allow Roads and Maritime to locate and maintain traffic signal components.*

Car Parking Areas

Issue

Roads and Maritime requires that safe access is provided onto the road network. The layout of the proposed car parking areas should therefore be designed in accordance with the relevant Australian Standards. Restrictions may be required to maintain the required sight distances at the accesses to the site.

Recommendation

The following condition is requested:

- *The layout of the proposed car parking areas associated with the subject development (including, driveways, grades, turn paths, sight distance requirements in relation to landscaping and/or fencing, aisle widths, aisle lengths, and parking bay dimensions) should be in accordance with AS 2890.1- 2004, AS2890.6-2009 and AS 2890.2 – 2002 for heavy vehicle usage.*

Swept Paths

Issue

Roads and Maritime requires that the site be designed so site operation does not impede access and efficiency of the road network. Therefore, vehicle swept paths should be designed for the longest vehicle entering the site.

Recommendation

The following condition is requested:

- *The site should be designed to cater for swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site in accordance with AUSTROADS requirements.*

Additional Access

Issue

An additional access would facilitate easy access to the eastern side of the proposed IMEX loading and container storage area for emergency purposes.

Recommendation

The following condition is requested:

- *The proponent should provide additional vehicular access is provided at the southern end of the IMEX (between the western and eastern loading and container storage areas) for emergency purposes.*

Utility Adjustment Works

Issue

The developer should assume responsibility for any utility adjustments associated with the above traffic signal modifications.

Recommendation

The following condition is requested:

- *All public utility adjustment/relocation works, necessitated by the installation of new or modification to existing traffic signals and as required by the various public utility authorities and/or their agents will be the responsibility of the proponent.*

Road Safety Audit

Issue

Road upgrades proposed must be designed to the appropriate design standards and should be verified for safety by a road safety audit.

Recommendation

The following conditions are requested:

- *Prior to the issue of any construction certificate, the proponent is required to undertake a Road Safety Audit for the proposed construction vehicle assess on Moorebank Avenue by an independent TfNSW accredited road safety auditor in accordance with the relevant Austroads guidelines to identify the safety issues for the proposed construction vehicle access. The proponent shall recommend corrective actions for the identified safety issues and propose appropriate traffic management measures (i.e. temporary traffic signals and other traffic management measures) in consultation with TfNSW and Roads and Maritime; and*
- *The Road Safety Audit report should be submitted to Liverpool / Campbelltown Councils and Roads and Maritime for review and comment.*

Construction Traffic Management Plan

Issue

The construction traffic management plan proposed by the proponent should be comprehensive and submitted to and approved by Roads and Maritime, Liverpool and Campbelltown Councils.

Recommendation

The following conditions are requested:

- *In consultation with the relevant stakeholders, a Construction Traffic Management Plan (CTMP) detailing staging of works, construction vehicle routes, construction traffic generation, construction traffic impacts, impacts to pedestrians / cyclists, local property access, hours of operation, parking for workers, access arrangements, cumulative construction impacts, mitigation measures and traffic control should be submitted to the Roads and Maritime and Liverpool / Campbelltown Councils for approval prior to the commencement of construction works.*

Operational Traffic Management Plan

Issue

To achieve the NSW State Plan targets, the proponent is required to work with the Cargo Movement Coordination Centre to achieve the recommendation below.

Recommendation

The following condition is requested:

- *In consultation with the Cargo Movement Coordination Centre the proponent should develop an Operational Traffic Management Plan to address the proposed Vehicle Booking System. The Cargo Movement Coordination Centre coordinate Port Botany road and rail interfaces. Consistent parameters, for example turnaround times, and interoperable technology should be implemented for example having Port Botany RFID tags work at Moorebank.*

Road Occupancy Licence

Issue

The proponent must have the necessary permits and approvals prior to commencing work on Moorebank Avenue to upgrade access to their site.

Recommendation

The following condition is requested:

- *A Road Occupancy Licence (ROL) must be obtained from the Transport Management Centre (TMC) for any activity likely to impact on the operational efficiency of the road network. The ROL allows the applicant to use a specified road space at approved times, provided certain conditions are met; and*
- *Proponents must allow a minimum of 10 working days for processing from date of receipt. Traffic Control Plans are to accompany each ROL application.*

SEARS Infrastructure / Upgrade Contributions

Infrastructure / Upgrades Contributions	*An assessment of the impacts of the project on local infrastructure, demonstrating that satisfactory arrangements are in place to support and mitigate any impacts of Stage 1 of the Concept Plan, including applicable costs, timing, TEU thresholds and approval pathways for such measures; Assess operational traffic and transport impacts to the local and regional road network, including monitoring of vehicle numbers on Cambridge Avenue.*
	Draft Voluntary Planning Agreement (VPA) addressing the following matters: i. consultation with relevant bus provider(s) regarding the potential to extend the 901 bus service; ii consultation with the relevant authority to facilitate the delivery of any part of the site or surrounds that will be upgraded, embellished, constructed or dedicated to the Commonwealth, Transport for NSW or the relevant Council that is directly attributable to the carrying out of the proposal.
	The draft VPA may also include a commitment to pay developer contributions to the relevant consent authority or undertake works-in-kind towards the provision or improvement of public amenities and services. Note: The VPA must be executed prior to the determination of the Stage 1 SSD pursuant to condition 1.9 of the Concept Plan Approval.
	Consideration of vehicle monitoring on Cambridge Avenue during operation of the project, to ensure any impacts are captured and adequately mitigated as a result of the project.

An assessment of the impacts of the project on local infrastructure

Issue

It is important to understand the relationship between containers received and vehicles generated from this site and their origin to monitor compliance with Planning Assessment Commission (PAC) conditions and to inform the transport assessment of future stages of development. A condition to report six monthly on vehicle movements through the truck gate is proposed.

It is also noted the PAC determination indicates the need to monitor vehicle numbers along Cambridge Avenue.

Recommendation

The following condition is requested:

- *The proponent is to generate and provide a report each six months (in a format agreed with TfNSW and Roads and Maritime) that advises:*
    - *The number of actual and standard twenty foot equivalent shipping containers despatched and received during the period;*
    - *The number of days in the period that the truck gate was open for despatching trucks 24 hours a day, 7 days a week. Detail any exceptions and advise actual hours of operation;*
    - *A record of every vehicle entry by class, date and time;*
    - *The number of light vehicles turning right into the SIMTA driveway and the number of light vehicles turning left from the SIMTA driveway for a representative day; and*
    - *The despatch location or origin address.*

Bus Services to the SIMTA Site

Issue

The 901 bus service operates between Liverpool CBD and Holsworthy Station travelling in proximity to the SIMTA site. The revised SIMTA statement of conditions of May 2015 does not reflect the outcome that TfNSW is the entity responsible for regular route bus services under the Passenger Transport Act 1990, has for effective bus regular route servicing of the Moorebank Intermodal terminal.

Recommendation

The proponent is requested to adopt the following in relation to bus services in their statement of commitments:

1. *Design and build a paved bus turnaround facility on Moorebank Avenue at the southern end of the MIT and SIMTA sites near Chatham Ave that will allow buses to U-turn safely. This is to have swept path dimensions to cater for a 14.5m long non rear-steer bus;*

2. *If the facility is on SIMTA land provide standing landowner permission for regular route buses to turn around within the facility so constructed as a condition of development consent;*

3. *The detailed design of the bus turnaround facility shall be audited by an independent TfNSW accredited road safety auditor in accordance with the relevant Austroads guidelines. The Road Safety Audit report should be submitted to TfNSW and Roads and Maritime for review and comment. The proponent shall recommend corrective actions for the identified safety issues and amend the design in consultation with TfNSW and Roads and Maritime to reduce the safety risks;*

4. *Install bus stops and shelters on Moorebank Avenue to align with a pedestrian access path directly into the SIMTA terminal. The bus stops should be appropriately designed in accordance with the relevant Austroads guidelines. A pedestrian access path network within the SIMTA terminal site should provide for direct access to these bus stops;*

5. *Provide appropriate pedestrian crossing facilities (from the western side of Moorebank Ave) in consultation with Road and Maritime Services to ensure the safe crossing of Moorebank Avenue to access corresponding bus stops. The bus shelter should closely align with the shelter on the SIMTA side of Moorebank Avenue. The facilities should be designed in accordance with the relevant Austroads guidelines; and*

6. *In anticipation that traffic volumes on Moorebank Avenue will continue to increase in the future a concept plan should be developed that demonstrates how the bus turnaround facility can be upgraded at a later stage to allow buses to u-turn safely possibly with signal control. This concept plan should include bus layover for two 14.5 metre buses on both sides of Moorebank Avenue.*

Consideration of Infrastructure Upgrades

The SIMTA concept plan approval includes the following conditions in the section marked 'Limits of Approval'

Condition No.	Limits of Approval
1.6	Projects carried out under this this Concept Plan must be operated with the objective of not exceeding the capacity of the transport network, including the local, regional and State road network. The container freight road volume must not exceed 250,000 TEUs, subject to the exception identified in 1.7, which may only be considered after the facility has been in operation.
1.7	The movement of container freight by road may exceed the 250,000 TEU limit by up to a further 250,000 TEU, if the consent authority of a subsequent Development Application is satisfied that traffic monitoring and modelling of the operation of the facility demonstrate that traffic movements resulting from the proposed increase in TEU will achieve the objective of not exceeding the capacity of the transport network.
1.8	In determining the TEU limit, the consent authority may take account any road works or mitigation measures proposed under a Voluntary Planning Agreement to minimise traffic impacts.

Issue

The SIMTA concept plan conditions provide (above) that at a future point in time, following the commencement of intermodal operation, a future development application to increase the TEU throughput to 500,000 TEU can be lodged.

TfNSW and Roads and Maritime advise that traffic modelling, monitoring and the works proposed under the draft Statement of Commitments are not considered adequate to achieve the objective of not exceeding the capacity of the transport network.

TfNSW and Roads and Maritime will be better placed to consider and advise the exact package of mitigation works that will be required when the current Roads and Maritime mesoscopic model is finalised and the SIMTA proponent can demonstrate the efficient operations proposed in the EIS can be achieved.

Recommendation

The applicant is requested to work with Roads and Maritime to demonstrate impacts of the 500,000 TEU on the road network.

SEARS – Noise and and Vibration

Noise and Vibration	*SEAR: An updated assessment of noise and vibration impacts. The assessment shall:* *Assess construction noise and vibration impacts associated with construction of the intermodal facility including rail link, including impacts from construction traffic and ancillary facilities. The assessment shall identify sensitive receivers and assess construction noise/vibration generated by representative construction scenarios focusing on high noise generating works. Where work hours outside of standard construction hours are proposed, clear justification and detailed assessment of these work hours must be provided, including alternatives considered, mitigation measures proposed and details of construction practices, work methods, compound design, etc.;* *Assess operational noise and vibration impacts and identify feasible and reasonable measures proposed to be implemented to minimise operational noise impacts of the intermodal facility and rail link, including the preparation of an Operational Noise Management and Monitoring Plan;* *Be prepared in accordance with: NSW Industrial Noise Policy (EPA 2000), Interim Construction Noise Guideline (DECC 2009), Assessing Vibration: a technical guide (DEC 2006), the Rail Infrastructure Noise Guideline (EPA 2013), Development Near Rail Corridors and Busy Roads Interim Guideline (DoP 2008), and the NSW Road Noise Policy 2011;* *All site-dedicated locomotives must meet EPA Noise Limits for Locomotives contained within the NSW operational rail licences for operation of new or substantially modified locomotives operating on the NSW network; and* *Any future application shall include a train noise strategy including, but not limited to, train operational procedures and driver training that minimise noise on the rail link and within the intermodal terminal.*

Noise from freight rail link

Issue

The EIS predicts that the rail link between the proposed terminal and the SSFL will be a major source of potential noise impact, including locomotive noise and idling, curve squeal, brake squeal, bunching and stretching. There is no evidence to support the "no curve gain" predicted noise from the rail link being achievable.

TfNSW consideration suggests curve squeal may be louder than predicted in the EIS.

The recommendation below is also requested as part of the recommended mitigation in the MICL EIS.

Recommendation

It is requested that the rail link is designed to avoid curve radii of less than 500 metres where possible in order to minimise squeal noise impacts.

It is requested that rail lubrication is used to mitigate squeal noise from tight radius curves.

It is requested that the use of top-of-rail friction modification should also be investigated.

Port Shuttle

Issue

It is noted that the proposal includes a port shuttle service which will run approximately 10 freight train movements per day on the SSFL between the terminal and Port Botany, with potential for noise impacts from increased train passbys on the SSFL. For the port shuttle the recommended approach of using locomotives that comply with ARTC's Environment Protection Licence 3142 is not sufficient to mitigate impacts on the main line.

Recommendation

It is requested the proponent prepares management measures including those related to locomotives, locomotive noise, vehicle idling, trucks and vehicles as part of any future Stage 2 SSD application.

The EIS recommended use of steering, permanently-coupled "multi-pack" wagons for the port shuttle service is supported.