



5 December 2014

Dear Sir/Madam,

**Re: Submission Regarding: Environmental Impact Statement for Moorebank Intermodal Terminal Facility - SSD 5066/EPBC 2011/6086**

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## 1 INTRODUCTION

We are pleased to lodge this submission in response to the Development Application and Environmental Impact Statement (EIS) recently prepared for the Moorebank Intermodal Terminal Project by Moorebank Intermodal Company (MIC). The GWS Group holds significant local interests including those identified as forming part of the Moorebank Intermodal Precinct.

GWS Group writes this letter in strong general support of the proposal to redevelop the Holsworthy Army Barracks (and other adjoining Commonwealth owned land) as an intermodal freight terminal. This project goes some way in facilitating strategic planning and transport policies, as it will provide a significant contribution to the key freight objective of the NSW Government, which is to increase the proportion of container freight being moved by rail from Port Botany.

Importantly though there are some issues of lack of focus on a holistic precinct approach with the application as submitted. In particular some of the optional rail access routes are not in keeping with a holistic precinct approach. Selection of the most appropriate access can better tie together the various adjacent sites and thus provide a stronger long-term shift to rail freight.

This letter outlines our overall support for the project and provides a holistic vision that offers significant improvements to the state and its people.

## 2 BACKGROUND

### 2.1 Current Projects

There are three key current proposals to consider in the precinct (see Figure 1). The first is the Sydney Intermodal Terminal Alliance (SIMTA) project; the second is the Moorebank Intermodal Project (MIC); and the third is the Glenfield Waste Services project (in its various parts). Importantly these three have the potential for strong interconnecting rail and road links and together they can generate significant short and long-term local employment.

The SIMTA proposal includes existing improvements comprising approximately 66-low rise buildings with a total floor area of approximately 238,000 m<sup>2</sup>, including warehouse and administrative offices with the Capital Investment Value of the proposed development sitting at \$490 million. The combined sites will create adjoining intermodal freight terminals, or together, an 'Intermodal Precinct'.

The Moorebank Intermodal Project comprises approximately 220 hectares of industrial land to develop a container terminal to handle up to 1.2 million containers per year.

Glenfield Waste Services operates a quarry, landfill and recycling facility. The GWS site is the subject of an application for a State Significant Development to move and expand the recycling facility. The GWS site is the subject of two (2) separate planning proposals to rezone the land to facilitate development of employment lands. In the longer term the GWS site presents the opportunity to facilitate the development of complementary freight rail related activity, namely, recycling, bulk materials and waste transfer together with locomotive provisioning.

## 2.2 The Drivers

### Freight Transport

The NSW Freight Strategy was prepared in response to the NSW Freight Plan and lead to a specific Freight and Ports Strategy, which had as its key objective, a reduction in the amount of road-hauled freight and the correlated increase in rail-hauled freight to and from ports.

Overall freight transport in NSW is predicted to increase from 409 million tonnes per year in 2011 to 794 million tonnes in 2031. Of this, in 2011, approximately 7 million tonnes was Sydney metropolitan miscellaneous freight. This volume is predicted to increase to 130 million tonnes in 2031 (TfNSW 2012).

Port Botany is NSW's main international and domestic container port, handling some 3 million twenty foot equivalent containers (TEU), a rate that is predicted to increase to 7 million TEU within 20 years. With current container handling rates, Sydney experiences significant traffic delays around the Port and beyond due to container trucks. These delays can only worsen as container handling rates rise.

The NSW Freight Strategy engaged with several supply chain industry reference groups, one being the waste industry. This engagement resulted in the 2012 Industry Reference Group Report-Waste that identified the following pertinent details:

- Waste generation is growing by 4.3 % per year in Australia.
- Approximately 58 % of generated waste is recycled and 42% goes to landfill.
- The transport task for Sydney Metropolitan waste equates to the Port Botany container task and is predicted to more than double by 2030.
- Lack of space in existing landfills and lack of suitable new landfill sites within the metropolitan area will tend to drive new landfills outside the region, probably outside economic trucking range. 400,000 tonnes per year of putrescible waste is currently railed to the Woodlawn landfill.

The main driving force to develop the two Moorebank container terminals is to address the current truck congestion issues to and from Port Botany and to provide suitable capacity to manage the predicted doubling of container freight at the Port in the next 20 years. Between them, the two projects would remove more than 6,000 trucks per day off Sydney's over-stretched road network.

## Employment and Housing

The South West Growth Centre is approximately 17,000 hectares in size and includes parts of the Liverpool, Camden and Campbelltown local government areas. The plan for this growth centre is to build an additional 110,000 dwellings for 300,000 new residents. With these new residents must come employment, otherwise they will become dormitory suburbs and so add significantly to existing road and public transport congestion.

## Construction Materials

Construction materials are a prerequisite for growth, construction and maintenance of public and private infrastructure and housing. The Sydney Metropolitan area consumes approximately 20 million tonnes of aggregates per year and most of this is truck-hauled. While demolition materials are increasingly being recycled into construction materials, consumption of new materials is widely forecast to increase.

With increasing road traffic conflicts, some major sand and aggregate producers are shifting to rail transport, which has significant environmental, social and economic advantages. However, given the very diffuse user market, rail freighted aggregates generally require off-loading at a rail terminal for trucking to the final consumer. Included within the Moorebank Intermodal Precinct, the GWS site presents the opportunity for the development of such a terminal.

## 3 MIC PROPOSAL BENEFITS

The MIC proposal will support NSW freight policy objectives, by reducing container transport to and from Port Botany by road.

The benefits arising from the proposal with regard to its strategic contribution to the development of the intermodal network and the increased share of container freight being moved by rail can be divided into economic/social and environmental benefits as follows.

The EIS reports the following economic and social benefits:

- Creation of some 1,500 direct and indirect jobs per annum over the construction period and some 2,175 jobs during operations.
- A reduction in net travel time and labour costs.
- A significant reduction in heavy vehicle traffic flows in and out of Port Botany.
- Creating a facility that will attract industrial and business development to the Moorebank Precinct.
- Invite land use development that will complement and not compete with the employment role of the Liverpool CBD.
- Provide a concentrated freight and logistics employment hub, thus providing key employment opportunities for the surrounding residential community, and accordingly promote close to home work opportunities.

A number of regionally ecologically sustainable development benefits have been identified arising from the shift towards rail based freight transport. This redevelopment will provide significant environmental benefits by way of:

- reducing daily congestion and heavy vehicle movement along the M5 Motorway between Port Botany and Moorebank and so improve air quality due to reductions in emissions for NOx and particulates;
- rehabilitation and regeneration of degraded areas of vegetation to improve the overall biodiversity quality of the land comprising the rail corridor (although this benefit is reliant on the southern rail access option being selected, as the northern and central options will have significant impacts); and
- a significant saving of greenhouse gases through improved transport and operational efficiency.

## 4 HOLISTIC PRECINCT VISION

The project EIS offers three rail access options. The northern and central rail access options appear to have significant disbenefits as compared to the southern option. The northern/central option would require or cause the following relative to the southern option:

- Higher construction cost (estimated at least \$50m extra).
- Significantly higher social impacts (noise, dust, visual) due to the close proximity to Casula residential area.
- Curtilage impacts to the heritage-listed Casula Power Station.
- Dispersion of heavy infrastructure away from existing rail alignments.
- Significant acquisition of land.

The proposed southern rail link to the MIC site is considered to support a 'whole-of-precinct concept', with the GWS site, the MIC site and the adjoining SIMTA site able to utilise the same connection point to the Southern Sydney Freight Line (SSFL).

The southern rail access option is considered to be the most appropriate alignment of the three alternatives that are being considered, having regard to the opportunities to reduce the potential cumulative impacts, including:

- lower estimated design and construction costs;
- less biodiversity impact;
- no impacts to the heritage-listed Casula Power Station;
- consolidation of heavy rail freight lines along an existing corridor;
- no acquisition requirement of land; and
- reduced flooding potential.

The proposed location of the southern rail access option associated with the MIC proposal is consistent with the location previously proposed by the State Government and is consistent with the immediately proximate use of the land (i.e. East Hills Railway Corridor), thus making it an ideal opportunity to use existing infrastructure and minimise on costs.

There are though further precinct-wide benefits of this southern access option. The GWS site, west of the MIC site, is owned by the GWS Group and is currently the site of a combined quarry, landfill and recycling facility. In the short term, there is a plan to lodge a State Significant Development application to relocate and expand the recycling facility to the south of the site, just north of Cambridge Avenue. This application is expected to be lodged early in 2015.

In the longer term, the GWS Group has a vision to be a more significant part of the local employment lands precinct concept by redeveloping the site to industries in keeping with the intermodal facilities. Specifically, GWS Group is investigating the development of an integrated bulk freight handling facility, with the following components:

- Construction materials import and redistribution terminal (most likely from currently operating quarries in the Southern Highlands and yet to be developed quarries elsewhere). This would involve sand and aggregate deliveries by rail, followed by storage and despatch by road to the diffuse user market in Sydney.
- An expanded construction and demolition waste recycling facility, most likely serviced by trucks;
- A regional waste transfer station.

- A waste forwarding terminal that would load trains bound for existing or future landfills outside Sydney Metropolitan area.
- Approximately 10 hectares would remain (not counting proposed biodiversity offset areas and riparian corridors) that could facilitate one or more related operations, such as locomotive provisioning, warehousing, or other light industrial uses.

This long-term plan would generate local employment, facilitate Government policies of freight to rail and improved recycling, and would complement the intermodal terminal operations.

Selection of the southern rail option appears to better integrate the existing rail network, and provides an opportunity to have a precinct-wide approach to transport.

## 5 CONCLUSION

GWS Group has reviewed the Moorebank Intermodal Terminal Project Environmental Impact Statement. It is a comprehensive report that gives consideration to all required aspects of the proposal, as well as the SIMTA proposal. GWS Group considers this an excellent opportunity to further advance the assessment of both the MIC and SIMTA proposals and to facilitate the planned provision of an Intermodal Precinct at Moorebank. Overall, the assessment provides evidence that the development proposed is in the public interest, both from an economic and environmental perspective and is supported.

The approval of the intermodal facility, with the southern rail option, provides a rare opportunity to provide for precinct-wide planning. Construction and operation of the Moorebank Intermodal Terminal Project with the southern rail access option would:

- reduce truck freight from Port Botany;
- allow the integration with the existing rail network;
- use a reliable local road network that can be improved and expanded as required (for example replacement of the Cambridge Avenue low level causeway, and improved direct western links to the Hume Motorway);
- stimulate the economy in South western Sydney;
- provide local jobs; and
- have significant social and environmental benefits.

Perhaps most importantly though, this project would realise a precinct-wide plan that benefits local people, southern and south-western Sydney residents generally and the state population as a whole, by addressing one of the most pressing local issues, road transport. This precinct-wide plan can also be built upon by future private developments to help address three of Sydney's other rising issues, waste, construction materials and local employment.

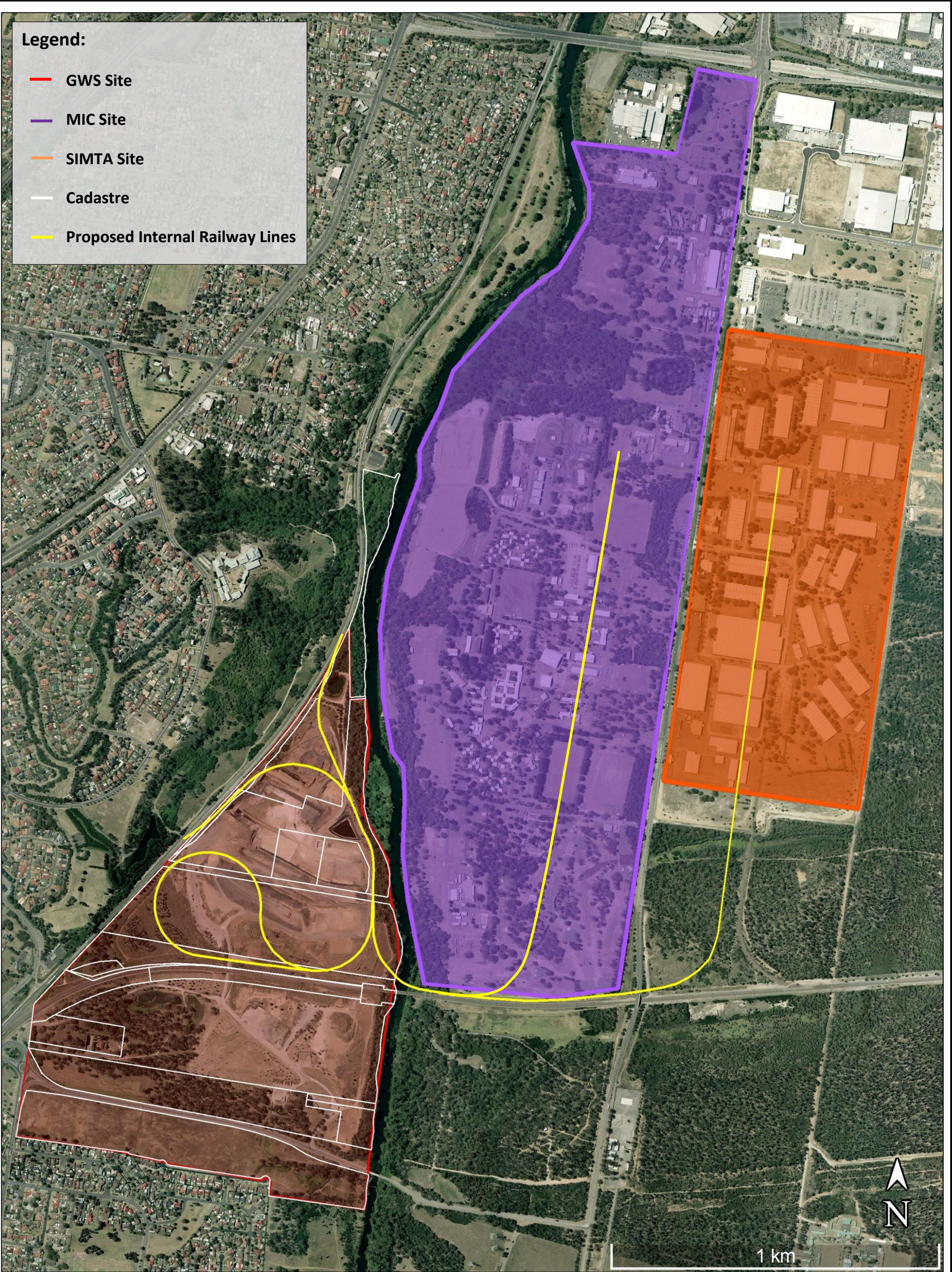
Yours sincerely,



**Georgie Kennett**  
General Manager

Enc: Figure 1





Map Title:	Moorebank/Glenfield Intermodal Precinct							Date:	4 Dec 2014	<div>ENVIRONMENTAL PROPERTY SERVICES</div> <div>Level 33, 264 George St, Sydney NSW 2000 9 Yacaaba St, Nelson Bay NSW 2315 Website: <a href="http://www.enviroproperty.com.au">www.enviroproperty.com.au</a></div> <div>Telephone (Sydney): 02 9258 1985 Telephone (Hunter): 02 4981 1600 ABN: 17 143 490 537</div>
Location:	Glenfield, NSW Australia	Author/ Reviewer:	RM/JB	Version No:	V01	Map/ DWG No:	1 of 1	Job Ref:	11015	