

11 December 2014

Karen Jones
Director Infrastructure Projects
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attn: Andrew Beattie

Dear Ms Jones,

**Re: Environmental Impact Statement for the Moorebank Intermodal Terminal,
Moorebank Ave, Moorebank (SSD-5066)**

Please accept NSW Ports' submission with respect to the proposed Intermodal Terminal (IMT) at Moorebank Avenue, Moorebank. NSW Ports supports the development of an IMT and freight precinct at Moorebank as part of a greater network of intermodal terminals and dedicated freight corridors to service the growing container freight needs of Sydney.

The greatest challenge facing the Port-related transport-logistics chain in NSW is the provision of efficient road and rail connections to and from the Ports. Building and improving the landside infrastructure to service the Ports of NSW requires substantial lead time in order to gain approvals, secure finance, undertake procurement processes and then construct and operate the infrastructure. It is therefore imperative that decisions to proceed are made well ahead of the demand that the landside infrastructure is designed to meet.

Intermodal terminals play an important role in facilitating landside efficiencies as part of moving freight to the required destination. They are critical to ensuring Port Botany is able to continue to cater for the growing freight task as the population continues to grow.

Port Botany's total container volumes doubled over a ten year period, growing from approximately 1 million TEUs in financial year 2002 to approximately 2 million TEUs in 2011. This reflects an average annual growth rate of 7.3 per cent. NSW Ports projects continued container growth over the next five years (with a forecast average annual growth rate of 6.2%), with container volumes expected to reach nearly 2.9 million TEUs in the 2018 financial year. Beyond the next five years, the NSW Government forecasts that 7 million TEUs could be handled at Port Botany by 2030 (NSW Freight and Ports Strategy, November 2013).

The NSW Government has also set an objective of doubling the current rail mode share for containers transported from Port Botany by 2020 (NSW 2021, September 2011). This requires a rail mode share of 28% to be achieved.

NSW Ports' objective is to ensure that rail infrastructure is capable of handling 3 million TEUs over the next 30 years.

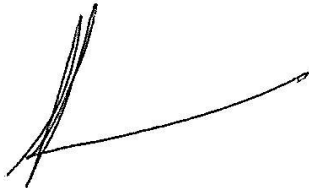
Increasing rail's mode share of freight distributed to and from the Port Botany, to achieve the NSW Government and NSW Ports objectives, is only possible through the enhancement and expansion of the dedicated freight rail network and through the development of a network of metropolitan intermodal terminals. The Moorebank IMT is critical to achieving this and will be required to handle at least 1 million TEUs. Even still, additional intermodal terminals with dedicated freight rail connections will be required around Sydney including at Eastern Creek, similarly on a dedicated freight line and with a capacity of at least 1 million TEUs.

An intermodal facility at Moorebank would contribute to increasing rail's mode share of freight to and from Port Botany and would help towards achieving the NSW Government's and NSW Ports' rail mode share target. The proposal will also assist in reducing the growth of truck transport movements to and from Port Botany. A considerable benefit of Moorebank is that it is capable of being accessed via the dedicated freight rail line, providing a dedicated freight rail connection between the IMT and Port Botany.

NSW Ports therefore strongly supports the application for an IMT at Moorebank.

If you have any further questions regarding this submission, please do not hesitate to contact Marika Calfas, General Manager – Strategy, Planning and Infrastructure on 9316 1105.

Yours sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke extending to the right.

Stephen Cleary
Chief Executive Officer