



10 December 2014

Ms C McNally  
Secretary  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001  
**Attention: Andrew Beattie**

Dear Ms McNally

**Joint Exhibition of a Staged State Significant Development Application,  
Environmental Impact Statement (EPA Act 1979), Draft Environmental Impact  
Statement (EPBC Act 1999) and Planning Proposal  
Your Reference: SSD 5056 and EPBC 2011/6086**

I refer to the Department's letter of 3 October 2014 inviting Council to comment on the above proposal for an Intermodal Freight Terminal at Moorebank. Council notes that this is the second proposal for such a development at Moorebank, both located on Moorebank Avenue.

Council wishes to thank the Department for inviting Council to comment on the proposal and also wishes to acknowledge the inclusion by the then Director-General, in his Requirements for the investigation of the proposal, of the need to consult with Campbelltown City Council in preparing the EIS and to specifically examine the impacts of the proposal on Cambridge Avenue. As you would be aware, even though the proposal is located in the City of Liverpool, the site is close to that City's boundary with Campbelltown and my Council considers it essential that any analysis of the proposal specifically considers its potential impact on Campbelltown and its community.

I can advise that, pursuant to the Director-General's Requirements, the proponent has discussed the proposal with Council and has examined its potential impact on Cambridge Avenue and related road routes in Campbelltown.

Council has also had the benefit of reviewing the recent determination by the Planning Assessment Commission (PAC) in relation to the SIMTA proposal at Moorebank and has taken these findings into account in its consideration of the current proposal

As a result, Council still has a number of concerns relating to the proposal which it wishes to draw to your attention by way of objecting to the proposal in its current form. These issues can be summarised as follows:

- Lack of an overall Master Plan for the redevelopment of the Moorebank Precinct to guide assessment of proposals in the Precinct

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- Lack of co-ordination between the SIMTA and MIC proposals leading to concerns over potential cumulative impacts and operational viability of either terminal
- Lack of certainty over rail access to the MIC proposal
- Lack of certainty regarding road/traffic impacts of the MIC proposal
- Lack of commitment by the proponent and the State and Commonwealth Governments to satisfactorily address off site infrastructure needs

Council notes that, in 2005, the NSW Freight Infrastructure Advisory Board recommended that a Master Plan be developed for the Moorebank Precinct to guide the development of future freight facilities at Moorebank. This was never carried out and has resulted in two unco-ordinated intermodal terminal proposals now being presented to the community for consideration. It is generally acknowledged that, given issues such as market forces, rail capacity and the single catchment in which Moorebank would operate, both proposals cannot proceed as currently envisaged.

The PAC considered this issue in some detail and concluded

*The Commission is disappointed that the recommended master plan for the site was never undertaken, particularly as there are now two competing proposals causing both uncertainty and alarm in the community about the cumulative impacts should both proceed.*

As part of its assessment of the SIMTA proposal, the PAC indicated that it had held a joint meetings with the two proponents

*to discuss whether the planning process for the two proposals could be combined, particularly given the absence of a single precinct master plan and agreement that both proposals could not proceed on the scale proposed. The Commission expressed its strong concern that to proceed separately would cause great uncertainty and alarm in the community.*

*The two parties advised the Commission that although they were currently in negotiations endeavouring to agree on a single proposal for the precinct, this would take time and there was no guarantee that agreement would be reached. Accordingly, they indicated that they would continue with the planning process separately.*

Council agrees with the conclusions of the PAC on this issue and, given the apparent lack of progress by the two proponents on reaching a satisfactory development outcome, requests the State and Commonwealth Governments to actively broker discussions between the two Intermodal Proponents with a view to rationalising the competing proposals and to work with the Councils and the local community to prepare a Master Plan for the Moorebank Precinct to guide assessment of proposals in the Precinct, taking into account impacts on surrounding local areas from redevelopment of the Precinct.

In relation specifically to the current proposal, Council is concerned that rail access to the site, which would be fundamental to the successful operation of an intermodal terminal and fundamental to realising any of the claimed traffic and environmental benefits of the proposal, remains to agreed, secured and constructed. It is not considered acceptable to issue approval for an intermodal terminal with three potential rail access routes and leave the selection of a route to later discussions with an end user of the terminal.

In this regard, it is noted that the PAC commented on the three potential rail access routes into the precinct from the Southern Sydney Freight Line and indicated that the southern route was preferable. In order to promote co-ordinated development of intermodal facilities at Moorebank, if either eventuate, it is considered that a single route needs to be identified.

In addition to identifying a single rail route, Council remains concerned over the commitment to, and timing of, construction of the link. It is Council's view that any rail link should be operational prior to commencement of terminal operations. As Council understands the current situation, SIMTA is only committing to seek approval for its rail link as part of its first Project Application. There is no committed timetable for construction.

In contrast, the current proponent has indicated an intention to have one direction of the rail link operational prior to commencing terminal operations (2018) but not to complete the two way link for another 10-12 years. Mitigating against completion of any link by 2018 is the fact that a preferred option has yet to be defined and secured.

Accordingly, Council submits that approval should not be granted to operate the proposal as a separate entity unless and until delivery of a full north and south bound rail link between the site and the Southern Sydney Freight Line is secured and operational.

In the event that approval is granted to the proposal, Council considers that the approval should lapse if the link is not secured and constructed to enable terminal operations within the initial 3 year timeframe foreshadowed by the proponent or the lodgement of future staged development applications for the proposal should be prevented unless and until delivery of the rail link to enable terminal operations is secured.

Council remains concerned over potential road traffic impacts on the City of Campbelltown arising from the proposal. Council expressed the same views in relation to the earlier SIMTA proposal and was strongly supported by the PAC in that regard:

*The Commission shares Council's concerns and has concluded that more detailed impact assessment of Cambridge Avenue is required.*

As a result, in resolving to grant Concept Approval, the PAC made the following finding:

*A more detailed impact assessment of Cambridge Avenue is required, not just monitoring of vehicle numbers, and measures should be identified to prevent heavy vehicles accessing residential streets*

Accordingly, Council submits that it should be consulted directly by TfNSW and RMS with a view to satisfactorily determining the potential traffic implications for roads other than Moorebank Avenue, such as Cambridge Ave, from terminal operations on the proposed site, together with synergistic effects from the operation of current proposal and other major transport related operations in the vicinity, including SIMTA, prior to any approval being granted to the current proposal.


Council further seeks assurances from the State Government and proponents prior to granting of any approval that all essential on- and off- site infrastructure needs arising from the proposal are identified and met in a timely fashion at no cost to Council, with clear responsibilities established for individual components of the infrastructure task. In this regard Council considers it to be necessary and appropriate, in the event of any approval, for the State Government and the proponents to enter into a Planning Agreement to satisfactorily upgrade Cambridge Avenue and construct a new road link between the Glenfield Road overbridge and Campbelltown Road thence linking to the F5 Freeway, to ensure that the traffic related to the development does not pass through residential areas as vehicles head in a north westerly direction.

Finally, in light of the substantial change to the local community which would eventuate if either (or both) intermodal facilities proceed, Council reiterates its request for the State

Government to enter into discussions with Council prior to, or accompanying, any approval as to implications of the terminal(s) for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive benefits of the terminal(s) for the local area.

Council would be happy to discuss the above views with the Department. I would invite you to contact me on (02) 4646 4575 should you wish to meet.

Yours sincerely

A handwritten signature in black ink, consisting of a stylized 'J' followed by a horizontal line.

Jeff Lawrence  
**Director Planning and Environment**