



24 June 2015

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

Dear Ms McNally

Staged State Significant Development – Moorebank Intermodal Terminal – Response to Submission
Your Ref: SSD 5066

I refer to the Department's letter of 26 May 2015 inviting Council to comment on the Response to Submissions relating to the exhibition of EIS material for the above proposal for an Intermodal Freight Terminal at Moorebank in 2014.

Council is pleased to note that the proponent (MIC) has made a number of changes to the proposal as previously exhibited and that a number of these changes respond positively to concerns expressed by Council in its submission following the 2014 exhibition. These are noted below.

However, Council has a number of remaining concerns, also outlined below, which it requests your Department to take into consideration in its further consideration of the proposal.

ISSUE 1 – NEED FOR A COMBINED MASTERPLAN AND RATIONALISATION OF DUAL TERMINAL OPERATION

MIC advises that an in principle agreement has been reached to the effect that SIMTA would become the developer and operator of a precinct-wide intermodal facility and associated warehousing across both the MIC and SIMTA sites. The Response to Submissions Report sets out the preferred project design and assesses the impacts of the precinct-wide facility.

COMMENT

Whilst it is encouraging that co-ordinated construction and operation of the two Terminals appears to be contemplated, it also appears that this arrangement has yet to be finalised. It is considered that a satisfactory joint development and operation arrangement should be put in place as a condition of any approval to ensure appropriate and co-ordinated construction and operation can occur.

It is noted that both MIC and SIMTA proponents envisaged their individual terminals could ultimately cater for all container demand arising from rail transport out of Port Botany. Accordingly, with a joint operation there would appear to be two capacity related risks – either both terminals are developed to less than full capacity and operate at a sub-optimal level with associated concerns over environmental performance and impact on the surrounding area or the precinct wide operation enables double the container capacity to be accommodated, also with potential concerns over greater impacts on the surrounding area. This issue should be addressed in any joint development and operation arrangement. Whilst the latter risk (additional capacity) could, and should, be controlled via appropriate approval conditions, the down side risk is only likely to be mitigated by appropriate investment and management strategies by the operator(s).

RECOMMENDATIONS

- 1 The requirement for a satisfactory joint development and operation arrangement be imposed as a condition of any approval to ensure appropriate and co-ordinated construction and operation can occur.
- 2 Any approval for either or both the MIC and SIMTA Terminals be subject to a condition to the effect that the total operational capacity of the Terminals, when combined, does not exceed the maximum capacity constraint as identified and assessed in the EIS material for each facility.

ISSUE 2 – LACK OF CERTAINTY OVER RAIL ACCESS ROUTE

MIC advises that it has selected the Southern Rail Access route as its preferred option, in accordance with Council's view.

COMMENT

This commitment is welcomed.

ISSUE 3 – LACK OF CERTAINTY OVER TIMING OF RAIL ACCESS CONSTRUCTION AND OPERATION

MIC has acknowledged Council's concern that rail access should be available and operational to service the precinct from the outset of Terminal operations and has noted that the link needs to be constructed "*consecutively with the terminal construction*".

COMMENT

It is pleasing that Council's concern has been acknowledged. Nevertheless, it is considered that, should Concept Approval be granted, conditions should be imposed to require that Terminal Operations cannot commence unless and until appropriate rail access has been constructed and is operational.

RECOMMENDATION

- 3 Any approval be subject to conditions preventing commencement of Terminal operations unless and until appropriate rail access has been constructed and is operational.

ISSUE 4 – TRAFFIC IMPACTS, PARTICULARLY ON CAMBRIDGE AVENUE AND ROUTES INTO CAMPBELLTOWN CITY

MIC has acknowledged Council's concerns over potential traffic impacts on Cambridge Avenue.

In response it advises that "the upgrade of Cambridge Avenue is not being considered further because there is an assumption that only light vehicles associated with staff movement would use Cambridge Avenue to access the Moorebank terminal site. The volume of this traffic is predicted to be low and does not trigger a requirement to upgrade Cambridge Avenue. Access into and out of the Moorebank terminal site will be via the intersection of Moorebank Avenue and Anzac Road. The intersection will be signalised with physical barriers to prevent trucks from turning right onto Moorebank Avenue. This will force all vehicles particularly heavy vehicles to turn left onto Moorebank Avenue to access the M5/Hume Highway. Similar measures will prevent trucks from entering the site from the south along Moorebank Avenue. Hence trucks associated with the terminal will be unable to access the southern end of Moorebank Avenue and Cambridge Avenue. In the event of an accident on the M5 Motorway/Moorebank Avenue north of the terminal, the terminal will need to shut down until the traffic is cleared."

COMMENT

It is pleasing that Council's concern has been acknowledged and traffic impacts on Cambridge Avenue have been specifically examined. It is also welcome that heavy traffic is proposed to be excluded from using Cambridge Avenue by virtue of the design of the Terminal access arrangements.

Nevertheless, it is noted that a measure of light traffic associated with the Terminal is expected to use Cambridge Avenue.

To ensure that only light traffic associated with the Terminal is able to use Cambridge Avenue, it is considered that any approval should be conditional upon prevention of heavy vehicle access to and from Cambridge Avenue.

In the absence of any such condition(s), Council would need to be assured by either condition(s) of consent or a Planning Agreement with Council to ensure that appropriate upgrade and maintenance works would be carried out on Cambridge Avenue and related road routes to accommodate potential heavy vehicles associated with Terminal use, without adverse impact on Council's road infrastructure nor on the amenity of development fronting such roads.

It is noted that MIC proposes to enter into a Voluntary Planning Agreement with the State Government to address off site traffic impacts of the proposal. In the absence of any agreement directly with Council, it would be important for Council to be a party to any such discussions to help ensure its concerns are recognised and addressed in any Agreement entered into.

RECOMMENDATION

- 4 Any approval should be conditional upon prevention of heavy vehicle access to and from Cambridge Avenue
- 5 Should such condition(s) not be imposed, alternative condition(s) be imposed requiring the proponent to ensure that appropriate upgrade and maintenance works would be carried out on Cambridge Avenue and related road routes to accommodate potential

heavy vehicles associated with Terminal use, without adverse impact on Council's road infrastructure nor on the amenity of development fronting such roads

- 6 Any approval condition requiring MIC to enter into a Planning Agreement with the State Government to address off site traffic impacts of the proposal be accompanied by a requirement to consult Campbelltown City Council and take its concerns into account as part of preparing any such Agreement

ISSUE 5 – INTERACTION WITH OTHER FREIGHT FACILITIES IN THE AREA

Council has expressed its concern over the possible interaction between the Moorebank Terminal(s) and existing freight terminals in the vicinity, such as Macarthur Intermodal Shipping Terminal (MIST), with concerns expressed over the impact of possible truck traffic between the Terminals.

COMMENT

Given the potential impact of traffic between the Terminals should operational intentions change in future, any approval for the MIC Terminal should be conditioned to require a separate approval prior to such interaction taking place.

RECOMMENDATION

- 8 Any approval be subject to conditions to the effect that, should operational intentions change in future with the potential to lead to interaction between MIC and other freight terminals in the area (including but not limited to MIST) a separate approval be required prior to such interaction taking place.

ISSUE 6 - STRATEGIC CONTEXT

If the MIC Terminal proceeds, it will introduce a major new land use into the locality and, provided adverse impacts are addressed appropriately, it would present a significant opportunity to review strategic land use and infrastructure settings in the area to capitalise on any positive spin-offs of the Terminal.

COMMENT

Any review of strategic planning in the area would most appropriately be carried out in a partnership between the Federal and State Governments, working with Campbelltown Council.

Aspects which warrant consideration include

- Broader land use changes to capitalise on the potential economic and employment benefits from improved freight handling and distribution (allied with current freight handling facilities in the area) and
- A review of the overall transport infrastructure in the area to facilitate economic and employment growth in South West Sydney.

RECOMMENDATION

9 In the event of approval of the MIC Terminal, the Federal and State Governments commit to working with Campbelltown City Council to review strategic planning settings in the locality to maximise positive spin-offs from the Terminal construction and operation.

Should you wish to clarify any of the above matters, or discuss the issues raised, Council would be pleased to assist. In this regard, please contact Council's Director, Planning and Environment, Mr Jeff Lawrence, on 4645-4576.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LDeitz', with a stylized flourish at the end.

Lindy Deitz
Acting General Manager