EPS

25 November 2016

Ms Alix Carpenter
Department of Planning and Environment
Level 22, 320 Pitt Street
Sydney NSW 2000

Dear Alix,

Re: Submission on Moorebank Precinct West – Stage 2 Proposal (SSD16-7709)
Environmental Impact Statement prepared by Arcadis Design & Consultancy October 2016

1 INTRODUCTION

Environmental Property Services (Aust) Pty Ltd (EPS) has been instructed by our client, Glenfield Waste Services (GWS), to lodge this submission on their behalf in response to the Moorebank Precinct West – Stage 2 state significant development application. Accordingly, EPS has reviewed the Environmental Impact Statement (EIS) lodged with the NSW Department of Planning and Environment and currently exhibited on the Major Projects register. We note that the EIS has been prepared by Arcadis Design & Consultancy dated October 2016.

On behalf of GWS, this letter provides strong general support for the approval and subsequent construction and operation of the Moorebank Precinct West Project (MPW Project), and specifically supports Stage 2 of the project which collectively comprises:

- Construction and operation of an intermodal freight terminal facility capable of supporting a container freight throughput volume of 500,000 twenty-foot equivalent units (TEUs) per annum;
- Approximately 215,000m^2 gross floor area of warehousing;
- Rail link connection; and
- Intersection works at Moorebank Avenue and Anzac Road.

Having previously reviewed the wider Moorebank Intermodal Company (MIC) concept plan, we note that the Stage 2 works are consistent with the Concept Plan Approval which was granted in June 2016. This letter outlines our client's overall support for the project, the consistency of the project with both National and State Government policy objectives, and outlines the significant opportunities and improvements this proposal offers to the region and wider state of NSW.

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2 PROJECT UNDERSTANDING

The development of the Moorebank Intermodal Precinct is based on a 'whole-of-precinct' approach as agreed between Moorebank Intermodal Terminal Company (MIC) and Sydney Intermodal Terminal Alliance (SIMTA). The precinct provides potential for strong interconnectivity of rail and road links and will generate significant short and long-term local employment.

We note that Stage 2 of the MPW Project consists of the following key works:

- Intermodal terminal facility, including:
  - Infrastructure to support a container freight throughput volume of 500,000 TEUs per annum;
  - Installation of nine rail sidings and associated locomotive shifter;
  - Capacity to receive trains up to 1800m in length;
  - Truck processing, holding and loading areas;
  - Container storage area serviced by manual handling equipment;
  - Administration facility, engineer's workshop and associated car parking;
- Rail link including:
  - Construction of the Rail link connection, which links the sidings within the IMT facility to the Rail link (included in the MPE Stage 1 Proposal, as detailed above);
  - The operation of the Rail link connection and the Rail link (from the Rail link connection to the SSFL);
- Warehousing area including construction of approximately 215,000m^2 GFA of warehousing, plus ancillary offices, with associated warehouse access roads;
- Upgraded intersection on Moorebank Avenue and Anzac Road, which would provide site access and egress and construction of an internal road; and
- Ancillary works including vegetation clearing, earth works, utilities installation/connection, signage and landscaping.

3 STRATEGIC CONSIDERATIONS

The proposal is wholly consistent with strategic planning and transport policies as it will provide significant contribution to the key freight objective of the NSW Government which aims to increase the proportion of container freight being moved by rail from Port Botany to 28%. The MPW Project offers a solution, consistent with both State and National planning frameworks and strategies. These are outlined below.

3.1 New South Wales Commitments and Policy Objectives

The NSW Government aims to increase freight movement by rail to improve the efficiency of port-related freight movements across the infrastructure network. The MPW Project is aligned closely to several key national commitments and policy objectives. These include:

- *'Navigating the Future' NSW Ports' 30 year Master Plan, 2015;*
- *A Plan for Growing Sydney, 2014;*
- *State Infrastructure Strategy and Update, 2012 and 2014;*
- *NSW Freight and Ports Strategy, 2013;*
- *NSW Long Term Transport Masterplan, 2012;*
- *NSW 2021: A plan to make NSW number one, 2011;*
- *Draft Subregional Strategy for the South West Subregion, 2009;* and
- *Railing Port Botany's Containers, 2005.*

3.1.1 'Navigating the Future' NSW Ports' 30 year Master Plan, 2015

'Navigating the Future' NSW Ports' 30 year Master Plan 2015 focuses on the long-term sustainability of our port and intermodal assets to meet the trade needs of NSW, for the benefit of the people and businesses of NSW. The Plan presents the actions required to meet the needs of NSW over the next 30 years and beyond, detailing the expected trade growth.

One of the five key objectives of the Plan is to grow rail transport of containers. The MIT Project is vital to meeting this key objective. The Plan notes that maximising the transport of containers by rail between Port Botany and Sydney metropolitan intermodal terminals will be essential for affordable, efficient and sustainable container distribution throughout Sydney. This can be achieved through the development of the MIT Project. The Plan recognises that intermodal terminals are critical to the logistics chain, and vital to increasing the volume of containers moved by rail. The MIT Project is consistent with the notion outlined in the Plan that intermodal terminal containers that adjoin a warehouse centre are more efficient as they remove the need for containers travel on an external network.

3.1.2 A Plan for Growing Sydney, 2014

A Plan for Growing Sydney 2014 aims to achieve a vision of Sydney as a strong, global city, a great place to live with a competitive economy within world-class services and transport, a city of housing choice with homes that meet our needs and lifestyles, with communities that are strong, healthy and well connected in conjunction with a sustainable and resilient city that protects the natural environment with a balanced approach to the use of land and resources.

Direction 1.5 of A Plan for Growing Sydney identifies the need to enhance capacity at Sydney's gateways and freight networks. Moorebank IMT will play an important role in the broader freight network, allowing for greater movements of freight by rail and assisting to reduce road congestion, especially around Port Botany. Moorebank IMT is also consistent with a priority of its South-West subregion, to protect infrastructure of metropolitan significance including intermodal terminals.

3.1.3 State Infrastructure Strategy and Update, 2012 and 2014

The State Infrastructure Strategy Update 2014 aims to assist the NSW Government in identifying, the highest value, most needed and most productive new infrastructure projects that could be delivered over the next 20 years if substantial additional funding becomes available from the Rebuilding NSW initiative. The Strategy recognises that reducing the cost and improving the reliability of the infrastructure-based services on which NSW businesses depend improves their competitiveness. Properly targeted transport investments reduce congestion costs for freight and logistics industries, with the provision of intermodal terminals such as the MIT Project playing a crucial role. The MIT Project is identified as a key infrastructure NSW recommendation under the strategic direction of international gateways.

3.1.4 NSW Freight and Ports Strategy

The NSW Freight and Ports Strategy provides a framework to guide the decisions and investments in the freight and logistics network over 20 years, with the aim of delivering a transport network that allows the efficient flow of goods to their market. The strategy aligns with broader strategic plans for the State's transport system detailed in the Long Term Transport Master Plan.

The MPW Project is a key component in the NSW Freight and Ports Strategy. The NSW Freight and Ports Strategy outlines that the Moorebank Precinct will provide much needed freight transport network capacity and employment opportunities in South West Sydney.

3.1.5 NSW Long Term Transport Masterplan, 2012

The NSW Long Term Transport Masterplan 2012 is the first integrated transport strategy which sets the path to deliver a transport system with a strong focus on customer needs, integration, modernisation and meeting projective growth over the next 20 years. The Master Plan outlines the benefits of the NSW transport system to improve freight efficiency and productivity through major investments and efficiencies in the road and rail freight networks and at ports, airports and intermodal terminals, and through the Bridges for the Bush program to improve regional connectivity.

Chapter 7 focuses on supporting efficient and productive freight, including an action to implement rail freight infrastructure enhancements to increase the share of freight carried on the rail network. Metropolitan IMTs are identified as critical to increasing the share of container freight moved by rail and to manage growing import container trade, particularly in Sydney. The Masterplan acknowledges the ability of rail to reduce congestion, with the focus on the freight catchment in south-west Sydney, where the Moorebank Precinct is to be located.

3.1.6 NSW 2021: A plan to make NSW number one, 2011

NSW 2021: A plan to make NSW number one is a ten-year plan to rebuild the economy, provide quality service, renovate infrastructure, restore government accountability and strength local environments and communities. A key target of NSW 2021 is to enhance rail freight movement, including doubling the proportion of container freight movement by rail through NSW ports by 2020. This is to be achieved especially through Port Botany, which the Moorebank Precinct would support.

3.1.7 Draft Subregional Strategy for the South West Subregion, 2009

The Subregional Strategy recognises the importance of improving the efficiency of freight transportation from Port Botany to increase port capacity, acknowledging the need for IMTs to service south-west Sydney. Moorebank Precinct is recognised as a key component for both Sydney's intermodal capacity needs and to help meet the goal of increasing rail freight movements from Port Botany. The development of Moorebank Precinct would provide jobs during both construction and operation for West and South-West Sydney.

3.2 National Commitments and Policy Objectives

The MPW Project is also aligned closely to several key national commitments and policy objectives. These include:

- *Australian Infrastructure Plan 2016;*
- *National Land Freight Strategy 2011 and 2012;*
- *National Ports Strategy 2011;* and
- *National Infrastructure Priority List and Update, 2009 and 2016.*

3.2.1 Australian Infrastructure Plan 2016

The Australian Infrastructure Plan (AIP) aims to lays out a comprehensive package of reforms focused on improving the way we invest in, deliver and use our nation's infrastructure. The reforms in the AIP are focused on producing productive cities and regions, ensuring efficient infrastructure markets, building sustainable and equitable infrastructure as well as ensuring for better decisions and better delivery.

The AIP states that *'the efficient movement of freight into, out of and across Australia is critical to the nation's ongoing productivity, growth and competitiveness'*. The Australian Infrastructure Audit, on which the AIP is based, predicted substantial growth in the national freight task, with both containerised and non-containerised trade predicted to increase by more than 130% by 2031.

The MIT Project is aligned with the AIP's strategic priorities of 'increasing Australia's productivity' and 'expanding Australia's productive capacity'. This was determined in a business case assessment which was undertaken by the MIT Project.

3.2.2 National Land Freight Strategy 2011 and 2012

The National Land Freight Strategy is a partnership between the Commonwealth, State, Territory and local governments and industry to deliver a streamlined, integrated and multimodal transport and logistics system, capable of efficiently moving freight throughout Australia. The National Land Freight Strategy includes the MIT Project as a case study, capable of accommodating increases in container trade at Port Botany while delivering $10 billion in economic benefits including improved productivity, reduced business costs, reduced road congestion and better environmental outcomes.

3.2.3 National Ports Strategy 2011

The National Ports Strategy 2011 aims to drive the development of efficient, sustainable ports and related freight logistics that together support the needs of a growing Australian community and economy and the quality of life aspirations of the Australian people. The Strategy provides background to the growth of the south-west area of Sydney, including increasing freight demand and the need for IMTs to maintain the rail modal share of container freight from Port Botany. The development of MPW Project is aligned with the aims of the National Ports Strategy.

3.2.4 National Infrastructure Priorities, 2009

The National Infrastructure Priorities - Infrastructure for an economically, socially, and environmentally sustainable future establishes a seven-step analytical framework to the develop a long term, coordinated national approach to infrastructure planning and investment.

The MIT Project was identified under the infrastructure objective of 'Competitive international gateways' as one of the 'Priority Infrastructure Pipeline projects with real potential'. The aim of this infrastructure objective is to "develop more effective ports and associated land transport systems to more efficiently cope with imports and exports". The development of the IMT at Moorebank would improve the efficiency of land transport systems, which aligns with core objectives of the National Infrastructure Priorities.

4 PROPOSAL BENEFITS

The benefit 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 have been outlined in terms of it's benefits for freight transport, economic and employment opportunities, and community and environmental benefits.

4.1 Freight Transport

As outlined above in both national and state strategies, insufficient IMT rail freight capacity is recognised as a key barrier to the future development of Sydney and improvements in national productivity. It is anticipated that demand for interstate freight will continue to grow consistently over the coming years, requiring additional IMT facilities at key points within the freight network. It is estimated that only 14% of container freight through Port Botany is transported by rail, as it is largely transported by road. In addition to interstate rail demand going directly to/from Sydney, there is also an anticipated increase in transit cargo between Brisbane-Adelaide and Brisbane-Perth services. These services require a Sydney terminal to consolidate and tranship cargo between services. In order for Sydney to meet the target of 28% rail mode share, further additions to the capacity and efficiency of the freight and logistics network are needed to increase the share of rail container freight transport so that Sydney has over 0.73 million TEU of IMT capacity.

Limited land surrounding Port Botany has led to container handling industries such as freight forwarding, transport, warehousing and container packing/unpacking being relocated in areas where land is more available and affordable. This has resulted in a marked increase in road activity relocating containers. To maintain the rail share of 14%, let alone to achieve an increase to the targeted 28%, additional metropolitan IMT capacity is needed, located in proximity to those catchment areas where import/export freight has its origin/destination.

The Moorebank Precinct includes the development of the Moorebank Precinct East and Moorebank Precinct West. An IMT at Moorebank would respond to Sydney's need for more freight handling capacity as the Proposal would enable more containerised freight to be moved by rail. The 3.2 million Twenty Foot Equivalent Unit ('TEU') capacity is expected to be reached in 2020. The MIT Project would provide capacity for 500,000 TEU annually. The Stage 2 proposal would specifically facilitate the delivery of infrastructure to achieve increased rail freight movements. The proposal would assist in providing a shift from road to rail. This shift is necessary to help reduce truck movements on already constrained road networks throughout Sydney. Easing the Port Botany bottleneck would enable the Port to cope with future growth and provide large scale freight capacity. Freight movement around Australia is expected to grow by 3.6% per year over the next 20 years.

4.2 Economic and Employment

The costs of transporting containers by rail for interstate markets would be reduced, leading to an increase in the share of freight movements by rail. The increase in freight movements by rail would contribute to improved productivity, a reduction in operating costs, increased reliability, a reduction in costs associated with road damage, congestion and accidents whilst leading to better environmental outcomes.

Further, the provision of 215,000m^2 GFA of warehousing will directly attract industrial and business development to Moorebank, and create a landuse development that will complement the employment role of the Liverpool and Campbelltown CBD's.

The Moorebank Precinct would result in the creation of approximately 570 jobs during the peak construction period of the Proposal and 1,265 staff for the operation of the warehousing area and the IMT facility operations. This provides a key employment opportunity for the surrounding residential community, promotes close to home work opportunities.

4.3 Community and Environment

Through the environmental assessment process a number of regionally ecologically sustainable development benefits have been identified arising from the shift towards rail based freight transport.

It is considered that this redevelopment will provide environmental benefits by way of:

- A net reduction in GHG emissions from the change in freight distribution totalling a saving of 1,472 tCO2-e/year;
- Reducing congestion and heavy vehicle movement along the M5 Motorway between Port Botany and Moorebank, which in turn leads to reduced noise levels, air pollution and fuel consumption; and
- The site provides an appropriate buffer zone between residential areas, and does not preclude development of public recreation facilities along the Georges River.

5 CONCLUSION

EPS has reviewed the Stage 2 MPW Project Environmental Impact Statement. It is a comprehensive report that considers all required aspects of the proposal. On behalf of GWS, this proposal is an excellent opportunity to further advance the MPW Project and to facilitate the planned provision of an Intermodal Precinct at Moorebank.

Overall, the assessment provides evidence that the development is in the public interest, both from an economic and employment perspective as well as from a community and environmental perspective.

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 Stage 2 MPW proposal would:

- Reduce truck freight from Port Botany;
- Allow the integration with the existing rail network;
- Stimulate the local, regional and state economy;
- Provide significant employment opportunities; and
- Align with the comprehensive strategic directions set out by both the State and Federal Government.

Accordingly, GWS strongly supports the continued assessment and development of the wider Moorebank Intermodal Precinct.

Best regards,

Jeff Burns
Principal