

25 November 2016

Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Ms Alix Carpenter

Dear Ms Carpenter

RE: Notice of Exhibition – Moorebank Precinct West Stage 2 (SSD 7709)

I refer to your exhibition notice regarding the subject 'state significant development' application that has been made to the Department by the proponent acting on behalf of the for the Moorebank Intermodal Company and its affiliates. I thank you for providing Council with the opportunity to comment on the proposal as exhibited.

In response to the exhibition material, Campbelltown Council makes the following comments:

1. Significant variation of current application to concept approval site/land use layout

Council raises issue with the significant changes made to the site's internal layout when comparison is made to the concept approval layout. While being cognisant of the concept approval's 'high level' detail, there are several matters which in Campbelltown Council's opinion require further explanation/justification as their deviation from the concept is substantial.

Given the magnitude of the changes, the proposal as submitted is almost to the point that it is not generally in accordance the relevant concept approval (as required by Condition 4) and will likely cause significant changes to the operation of the overall development not considered or addressed under the concept approval.

This includes the interrelationship of the subject development with the operation of the adjoining SIMTA Terminal development. It is therefore considered that the proposed revised layout of the site should be submitted as a modification to the original concept application in addition to simply as an incidental Stage DA, and include an assessment of implications to the holistic operation of the MIC and SIMTA developments, such as an assessment of traffic implications and connectivity between the adjacent terminal sites, and measures to maintain or improve traffic movements along Moorebank Avenue.

Some of the changes between the concept approval and current application include:

1.1 Rail siding location changes

The rail sidings are in quite separate location(s) within the site. Council assumes this decision has been made to better integrate the two intermodal sites, providing for a central rail spine throughout the intermodal precinct. However, this change creates some noteworthy issues for Campbelltown City, especially in light of concept approval conditions and discussions held with the proponent over time.

1.2 Internal/external truck access movements and impacts on Moorebank Avenue

The largest impact on the shifting of the rail siding is its reduction in truck access points along Moorebank Avenue. The Stage 2 proposal has one intersection with Moorebank Avenue while the concept approval had 3 for the same length of frontage. The implications of this are that where the concept approval allowed multiple trucks to enter Moorebank Avenue on synchronised signal phases, the current proposal only allows trucks to enter at a single point. This is likely to have significant impact on the performance of all traffic facilities on Moorebank Avenue as in order to facilitate efficient egress of trucks into Moorebank Avenue from the terminal, Moorebank Avenue and Anzac Road priority will significantly change. Should the 3 points remain as originally approved, the entry of trucks can be staggered along Moorebank Avenue, rather than being focussed on what is already a relatively busy intersection.

The proposed weaving motion for heavy vehicles going from the Stage 2 site to the Moorebank Precinct East site is considered likely to have a significant and potentially unreasonable impact on all traffic using Moorebank Avenue.

1.3 Truck right-turn movements from terminal onto Moorebank Avenue heading south

The proposed intersection design with Moorebank Avenue/Anzac Road appears to be inconsistent with the concept approval (SSD 5066) for the facility, refer to Schedule 4 – Condition E12:

All future Development Applications shall demonstrate how the main access to the site has been designed to prevent heavy vehicles associated with the facility from using Moorebank Avenue South, and should be accompanied by detailed engineering drawing(s).

Appendix 'G' to the current application clearly demonstrates that the intersection has been made viable for trucks (a-doubles maximum) to turn right onto Moorebank Avenue and head south, which is not considered to be compatible with the concept approval.

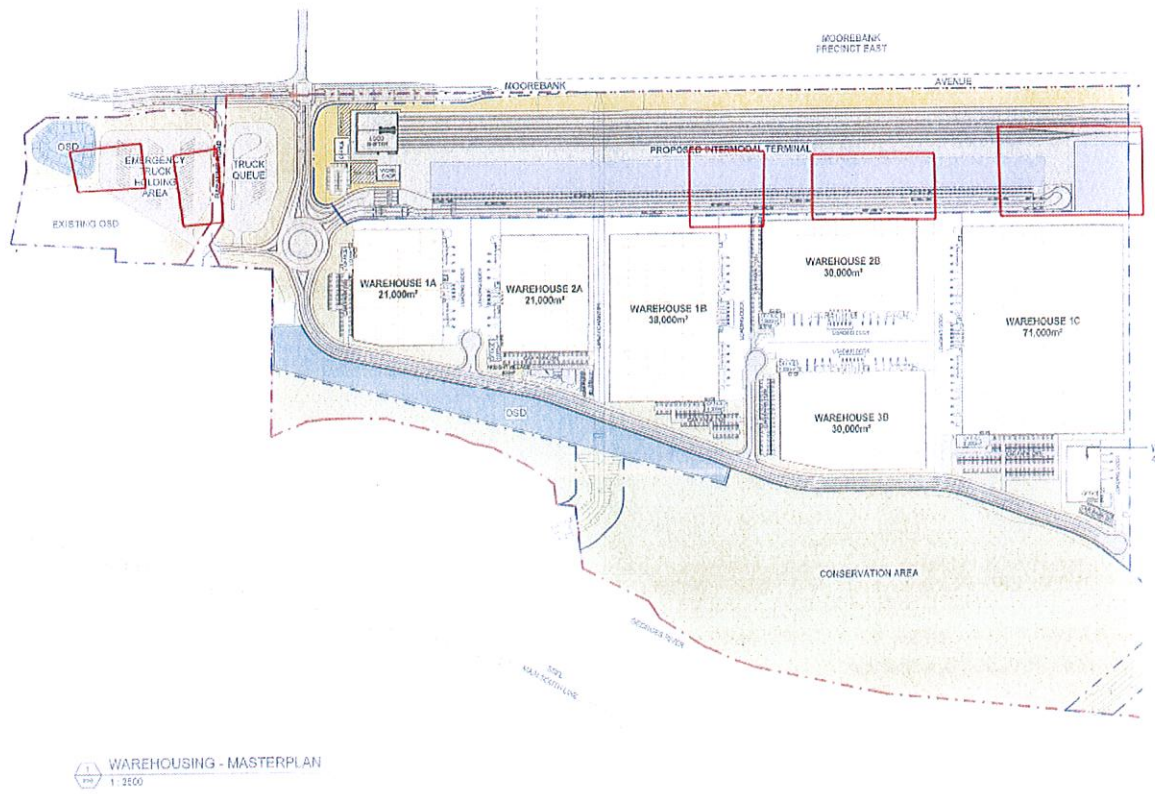
Even if the proponent suggests that the trucks would be heading in that direction to access Precinct East only and not continuing on to utilise the Cambridge Avenue Georges River crossing, the fact remains that the proposal is not consistent with the condition and there are no safe-guards proposed, aside from 'education of drivers' accessing the terminal. It could be argued that if the PAC considered driver education to be sufficient, that the wording of Condition E12 would have been different.

Heavy vehicles associated with the development utilising the existing Cambridge Avenue crossing of the Georges River has always been Campbelltown Council's principal issue of concern in relation to the intermodal terminal(s) being located on Moorebank Avenue. Emphasis is placed on 'the existing' crossing.

1.4 Warehousing area quantum

As mentioned, the site plan submitted with the current application is quite different in a number of aspects to the concept approval plan. In addition to changes mentioned earlier regarding road access, the quantum of warehousing proposed in this initial component of the overall site appears to significantly exceed that which was located in the same area within the concept approval plan.

See below for a sketch overlay of warehouse buildings on each plan. The red boxes are warehouse sites within the concept approval site plan for this portion of the site.



Of course, a significant part of these changes can be attributed to the shift in location of rail sidings, however, in the absence of a 'whole of site' plan accompanying the Stage 2 application, which may show less warehousing than the shown concept approval to ensure that total floor area is consistent with the concept approval, Council cannot be sure of the proponent's overall development intention with respect to warehouse provision.

2. Construction impacts

- 2.1 The Construction Traffic Management Plan (CTMP) assumes 0% of traffic (trucks and passenger vehicles) arrives to the site via Cambridge Avenue. As such, the proponent has not assessed any impact on intersections in Campbelltown City. This should be addressed as it is highly unlikely that no workers will arrive from this direction.
- 2.2 The CTMP peak small vehicle movements appear to be earlier than the AM peak on the surrounding network, this offsetting the combined peaks. This needs to be verified as reasonable. Construction traffic is commencing at 4am which on face value, would appear too early.

- 2.3 Council does not consider the proposed disposal of contaminated fill to Glenfield Waste Facility (and associated heavy vehicle traffic impacts) to be appropriate/permmissible having regard to:

- a. Non-compliance with the applicable development consents issued for the operation of the Glenfield Waste Facility - refer:

i. *Campbelltown City Council Interim Development Approval No. B3945 for development described as the "Establishment Of A Non-Putrescible Solid Waste Disposal Depot". Refer specifically 'Condition B 7: That wastes received on the site be restricted to non-putrescible solid wastes which are non-toxic and non-odorous and which, when deposited, will create no threat to the surrounding environment.'*

ii. *Liverpool City Council Development Consent No. 329/90 for development described as "Sand and Soil Extraction and the Disposal of Non-Putrescible, Non Toxic and Non Odorous Waste".*

- b. Inconsistency with the terms of the proposed 'Glenfield Waste Services Materials Recycling Facility', currently being considered by the Department (Application SSD 13_6249). Refer specifically to the 'Materials Recycling Facility Environmental Impact Statement' – namely that: "The proposed facility will not accept hazardous materials such as asbestos or chemical waste." (Page 12)

3. Other matters

- 3.1 There appears to be a lack of certainty relating to the cumulative environmental impacts resulting from the operation of both MIC and SIMTA Terminals, which rely upon a current evaluation of rail network constraints to limit cumulative operating capacity rather than consent conditions.

In this respect, the assessment modelling assumes a maximum cumulative operating capacity of 1.55M TEUs (for both terminals), however the respective concept approvals issued by the Department permit up to 500,000 TEUs for the SIMTA Terminal (Consent MP10-0193) and 1.55M TEUs for the MIC Terminal (consent SSD5066). A 500,000 TEU exceedance occurs when considering the literal maximums for each terminal separately.

- 3.2 Operational traffic spread has been sourced from Eastern Creek Industrial area. As this is not a 24 hour intermodal site, Council is unsure how this is representative of the traffic patterns to be expected at Moorebank.
- 3.3 Traffic volumes on Cambridge Ave in the AM and PM peak hours vary significantly from those provided for the Glenfield Waste proposal referenced earlier. This variation is in the order of 30% lower than the Glenfield Waste values in the peak direction. Council has traffic counts on Cambridge Avenue from 2011 which have similar volumes to those provided by Glenfield Waste. This discrepancy needs to be resolved.
- 3.4 Operational phase traffic – should heavy vehicle movements towards the Georges River crossing on Cambridge Avenue be restricted pursuant to Condition E12, the proponent should be required to demonstrate how existing heavy vehicle movements would continue to be allowed? According to the Glenfield Waste proposal traffic

assessment, there are 47 heavy vehicles using the causeway in the AM peak hour and 44 in the PM peak hour.

The SIMTA proposal indicates that there are 630 daily heavy vehicle movements on Cambridge Avenue both before and after the proposal (2019).

- 3.5 Revised consideration of the possible connection to the M31 and M7 via Glenfield needs to be included and discussed in consultation with RMS who are currently considering options for this route. There may also be opportunities for a joint bridge with the rail corridor which could deliver heavy vehicles to Glenfield Road via the Glenfield Waste Facility.
- 3.6 RMS is currently proposing major roadworks at Moorebank Avenue to address the safety and capacity issues associated with the major weaving that occurs here. These works need to be taken into account by the current application. Additional opportunities would appear to be available at Moorebank to create a vehicle and/or heavy vehicle underpass of the M5 to help deliver eastbound traffic and reduce congestion.
- 3.7 The proposal has assessed the intersections along Cambridge Avenue to determine impacts of the development. As with the Glenfield Waste proposal, the issue is not the intersections, but the number of heavy vehicles trying to pass on the causeway itself. Any increase could have a negative impact on safety. This has not been addressed by the current application and is of particular importance to Council, noting the intersection design in Appendix 'G'.
- 3.8 During the Operational phase of the facility, it is assumed that only 3% of employee traffic generation accesses the site via Cambridge Avenue. This would appear to be very low.
- 3.9 A continuous noise wall is proposed along the river side of the development. The wall appears to be located above the 1%AEP flood level but given the major status of the Georges River, will need to check its location relative to flood levels up to the PMF will be necessary. Consideration of how this wall interacts with flood flows may be required if it is below the PMF.
- 3.10 Finally, and significantly, there would appear to be an opportunity to reroute the through traffic (i.e. reroute Moorebank Avenue) via the riparian corridor, along the periphery of the development area, which (when the area is fully developed) would allow a better separation of traffic.

Thank you again for providing Council with the opportunity to comment on the proposal.

If you require any further information please contact me on (02) 4645 4566.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'AM' followed by a long, sweeping horizontal stroke.

Andrew MacGee

Acting Manager Development Services