

Department of Planning and Environment
GPO Box 39
Sydney NSW 2001
Attention: Daniel Gorgioski

Level 2, Brotherson House
Gate B103, Penrhyn Road
Port Botany, NSW 2036 Australia
T 1300 922 524
F 1300 440 198
E enquiries@nswports.com.au
W nswports.com.au

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Dear Daniel,

Re: State Significant Development – SSD-7308 - St Marys Intermodal

Thank you for providing NSW Ports with the opportunity to comment on State Significant Development (SSD) application - SSD-7308 for the construction and operation of an intermodal (road and rail) terminal and container park with an operating capacity of 300,000 twenty-foot equivalent units (TEU) annual throughput at Lot 2 Forrester Road, Lot 2 Lee Holm Road and Lot 196 Christie Street, St Marys. NSW Ports has reviewed the documentation related to the SSD application and is supportive of the proposal.

The Importance of St Marys Intermodal

The St Marys Intermodal will form an important link in the freight supply chain for NSW. Intermodal terminals allow for the rapid movement of containers by rail between the Port and warehouse facilities. NSW Ports have set a target to move three million TEU per year by rail by 2045 – around 40 per cent of forecast container volumes. The development and operation of new intermodal terminals such as the St Marys Intermodal is essential to achieving this target. Further, the NSW Government *Freight and Ports Plan 2018-2023* highlights the importance of new intermodal terminals to increase the utilisation of the rail freight network.

The growth of containers on rail is a key objective in *Navigating the Future*, NSW Ports' 30 Year Master Plan, to sustainably cater for the forecast trade growth. Maximising the transport of containers by rail between Port Botany and intermodal terminals is essential for efficient and sustainable container distribution throughout Sydney. Growth in the use of rail to transport containers will benefit the road network around Port Botany and greater Sydney by reducing the number of trucks tasked with the movement of freight. The St Marys Intermodal proposes to remove 10 million truck kilometres per year from the regional and state road networks, including primary freight routes servicing Port Botany. Intermodal terminals are an essential component of the port logistics supply chain and additional new intermodal terminals are essential for efficiently moving the growing NSW freight task by rail.

NSW Ports is at the forefront of freight rail connectivity and announced in November 2018 an investment to boost rail capacity at Port Botany. Improving 'on-dock' rail infrastructure at Port Botany at each of the three container terminals through a staged investment will improve the rail connectivity of Port Botany to metropolitan Sydney and regional NSW. Additional intermodal terminals located in Western Sydney are required to meet the rail freight demand and the St Marys Intermodal forms an important piece of infrastructure which will allow rail to play a more significant role in freight transport. The St Marys Intermodal development aligns with other important rail investment including Port Botany freight rail line duplication (Commonwealth funding announced), Moorebank Intermodal Terminal, Enfield Intermodal Logistics Centre and other projects identified in the *NSW Freight and Ports Plan 2018-2023* (NSW Government).

Almost 90 per cent of import containers through Port Botany are delivered within a 50 kilometre radius of Port Botany. The location of the St Marys Intermodal, along with future intermodal terminals in Western Sydney will contribute to the efficient movement of containers by rail, where they can be destined for the market or goods associated with the containers can be unpacked/repackaged at warehouses for distribution. However, if government policy and infrastructure aren't concurrently evolving to support freight rail, then freight rail disruptions and long term impacts will significantly affect the supply chain. This includes the timely approval, construction and operation of the Botany Rail Duplication project which will be an operational requirement to successfully operate the St Marys Intermodal without the risk of complications arising due to the construction of the Botany Rail Duplication project.

Other Strategic Projects

Further, in order to maximise efficient freight rail movements, further rail investments need to be made in Western Sydney. The Western Sydney Freight Line project is critical to the future of the growing freight needs of Western Sydney. The NSW Government *Future Transport Strategy 2056* identifies the future strategic road network in Greater Sydney as increasing reliance on dedicated freight rail corridors for movements between ports and intermodal terminals in the Central and Western Sydney.

Protecting corridors is a first step toward meeting future growth in Western Sydney. NSW Ports advocates for the protection of these vital freight corridors through their identification and zoning in environmental planning instruments. Ideally, these corridors would be identified and protected through a dedicated instrument and would receive protection from encroachment including through the application of Clauses 87 and 102 of *State Environmental Planning Policy (Infrastructure) 2007*. Protecting the Western Sydney Freight Line corridor, along with the Outer Sydney Orbital (motorway and rail line) will provide the freight and logistics industry with confidence the freight rail task is advanced and measures to expand the freight rail network are actively being explored, including critical long term infrastructure corridors in Western Sydney. However, further work needs to be undertaken to identify a final Western Sydney Freight Line route between Leightonfield and Eastern Creek. Additionally, in order to maximise freight rail opportunities, the Western Sydney Freight Line needs to be designed to connect to the Outer Sydney Orbital corridor to provide both north-south and east-west connections.

The *Greater Sydney Commission - Western City District Plan* identifies both the Western Sydney Freight Line and the Outer Sydney Orbital as infrastructure required to create a more connected Western Sydney. The *Western City District Plan* states:

By 2036, the Western Sydney Employment Area will be a key destination for cargo, with metropolitan intermodal terminals being critical for managing the rapidly growing import container trade and enabling more freight to be moved by rail. Duplication of the Port Botany rail line and a dedicated freight line and intermodal terminal for Western Sydney that connect to the Outer Sydney Orbital will support economic growth – driving employment and increasing the amount of freight carried on rail that will reduce heavy vehicle trips on the Sydney Road Network

The Greater Sydney Commission calls to action Councils, other planning authorities and State agencies to investigate, plan and protect future transport and infrastructure corridors. Proactively planning for the future of

the NSW freight task is essential for growing the capacity of intermodal terminals in Western Sydney. Investment in dedicated freight corridors will allow a more efficient freight and logistics network.

NSW Ports supports proposals of this nature which seek to facilitate a mode shift of the transportation of containers from road to rail.

If you have any questions regarding the above submission, please do not hesitate to contact myself on 9316 1151 or adriane.whiley@nswports.com.au.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Adriane Whiley', with a stylized, flowing script.

Adriane Whiley
Planning Officer