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## **Re: Sydney Gateway Road Project – SSI-9737**

Thank you for providing NSW Ports with the opportunity to comment on State Significant Infrastructure (SSI) application – SSI-9737 for the construction of a new direct high capacity road connection linking the Sydney motorway network at the St Peters interchange with Sydney Kingsford Smith Airport, known as the Sydney Gateway Road Project. NSW Ports is responsible for managing the port and freight assets of Port Botany, Port Kembla, the Cooks River Intermodal Terminal and the Enfield Intermodal Logistics Centre. These assets, along with the efficient movement of freight to and from these assets, are critical to the future economic growth, liveability, productivity and sustainability of New South Wales.

NSW Ports has reviewed the documentation related to the SSI application and makes the following comments for consideration.

### Encroachment on NSW Ports Lands

The plans exhibited with the EIS identify the operational development footprint of the Sydney Gateway Road project and includes land at the Cooks River Intermodal Terminal site. The Cooks River Intermodal Terminal is a staging point for containers, an empty container depot with repair and washing services, and an intermodal facility for regional and port shuttle trains. It forms a vital port-supporting asset in the supply chain and the operational efficiency of the site is paramount to NSW Ports.

In order to respond to the demands of the empty container supply chain, land availability at Cooks River is of vital importance. As such, NSW Ports stresses the need to minimise the amount of land that is resumed or sterilised to construct the Sydney Gateway Road project.

Given the importance of the site outlined above it is critical that the alignment of the Sydney Gateway Road project does not encroach on or sterilise any part of the Cooks River Intermodal Terminal site and alternate design solutions be finalised to avoid any disturbance to land or operation at the intermodal terminal.

If the Sydney Gateway Road project has development options that no longer traverses Cooks River Intermodal Terminal land, revised design plans should be presented. Further, NSW Ports will require the opportunity to review the revised plans for any adverse impacts which may result to the Cooks River Intermodal Terminal as a result of the road alignment.

### Canal Road Access Ramps

The Environmental Impact Statement (EIS) submitted with the application does not address access ramps at Canal Road, St Peters. Access ramps at Canal Road should be included in the design of Sydney Gateway. The inclusion of ramps at Canal Road would assist in servicing the Cooks River Intermodal Terminal which is a significant hub in the container logistics freight task and is NSW largest empty container storage facility. This will provide the Cooks River

Intermodal Terminal with a more direct connection to Port Botany by road, allowing it to play an ongoing role in supporting Port operations.

Further, the ramps at Canal Road would remove truck movements and congestion from local roads, in particular Mascot Town Centre and ensure the Sydney Gateway project properly services Port Botany and the NSW freight task.

Without the inclusion of the Canal Road access ramps it is unclear how the project assists with moving truck freight to and from the motorway network and heavy vehicles will continue to be forced on existing congested local roads.

To deliver on the State Government notion that the Sydney Gateway project connects towards Port Botany, supporting the freight task, the proposal should include the Canal Road access ramps. Without the inclusion of the Canal Road access ramps it is unclear how the project assists with moving truck freight to and from the motorway network and heavy vehicles will continue to be forced on existing congested local roads.

The Cooks River Intermodal Terminal acts as a satellite port gate. Efficient empty container return to the Cooks River Intermodal Terminal will be crucial following the removal of the Tyne Empty Container Park (ECP) at St Peters. To achieve efficient empty container return following the removal of the Tyne ECP, access ramps at Canal Road combined with super-B-double access to and from Port Botany to Cooks River will be paramount. Shuttling well utilised super-B-doubles between Port Botany and the Cooks River Intermodal Terminal via Sydney Gateway and Canal Road ramps will result in an overall reduction in freight traffic and heavy vehicles passing through Mascot.

The Greater Sydney Commission's Regional Plan, *A Metropolis of Three Cities* presents a vision and innovative actions for managing Greater Sydney's growth. The plan was prepared concurrently with the Future Transport 2056 Strategy and the State Infrastructure Strategy, aligning land use, transport and infrastructure planning and details strategies for Greater Sydney's freight and logistics networks to ensure it is efficient throughout Greater Sydney. The plan advocates for policy and investment to improve the efficiencies in the way freight travels throughout Greater Sydney.

*Greater Sydney's freight task is forecast to more than double in the next 40 years. Policies and investment to reduce the cost of moving freight and increase efficiency and productivity while minimising traffic and amenity impacts on adjacent urban uses are essential<sup>1</sup>.*

The Sydney Gateway Road Project has to the opportunity to significantly improve the efficiency, connectivity and productivity of Greater Sydney freight task through the inclusion of ramps at Canal Road. It is advised that the proposal reconsiders the inclusion of the Canal Road ramps to the Sydney Gateway project. The business case for the inclusion of the Canal Road ramps must be assessed and finalised as a critical priority to maximise the success and efficiency of the road connectivity of the project for the NSW freight task.

### Empty Container Park Capacity

The design of the Sydney Gateway results in the removal of the Tyne ECP at St Peters. The removal of this container park will remove approximately 25% of Sydney's empty container park capacity.

Empty containers need to be located and stored close to port infrastructure, allowing them to be efficiently shuttled and loaded, prior to ship departure. Container parks such as the Cooks River Intermodal and the St Peters Tyne ECP are critical given at Port Botany, empty containers accounted for approximately 61% of total containerised exports in 2018<sup>2</sup>. This imbalance in full and empty container exports results in a large volume of containers stored in Sydney at any given time. This requires sufficient and appropriate industrial zoned land to be provided to accommodate the ECP task.

Importantly, any ECP proposed to replace the Tyne ECP facility requires appropriate 24/7 operation, noise and traffic allowances to enable efficient operations.

The Planning Secretary's Environmental Assessment Requirements (SEARs) for the application state:

<sup>1</sup> Greater Sydney Commission, *Greater Sydney Region Plan, A Metropolis of Three Cities*, pg. 95, 2018

<sup>2</sup> KPMG, *Quay Conclusions*, pg. 16, 2019

*The Proponent must assess the social and economic impacts from construction and operation on potentially affected properties, infrastructure, utility services, **businesses (including impacts to freight management associated with the reduction of container storage,** and consequent impacts to the broader industry), recreational users and land and water users, and*

No solution has been put forward to date detailing how Sydney's empty container capacity will be compensated as a result of the resumption of land at St Peters which is considered a critical ECP site. Over the next 30 years, empty container exports will grow from about 670,000 twenty-foot equivalent unit (TEU) to up to 2.9 million TEU as the volume of full import containers grows at a faster rate than full export containers<sup>3</sup>. With the growing empty container task, the impact of the removal of the Tyne ECP must be mitigated. An empty container park strategy containing key solutions of how ECP capacity will be addressed is required, given the significance of ECPs and their role in supporting the key trade gateway of Port Botany. A feasible relocation solution for the Tyne ECP must be forthcoming and include flexible operation, noise and traffic allowances to reduce the magnitude of the impact of the resumption of this land for the project.

#### Benefits to Port Botany

NSW Ports recognises that the Sydney Gateway Road project may result in some conceivable benefits for Port Botany, however information pertaining to how the project will improve the level of service for Port Botany has not yet been provided.

The Sydney Gateway proposal is a significant road project which will positively benefit the Sydney road network, however, the project could further enhance the NSW container freight task through the inclusion of on/off ramps at Canal Road, St Peters and reallocation of empty storage capacity.

If you would like to discuss this submission further, please do not hesitate to contact me on (02) 9316 1151 or [adriane.whiley@nswports.com.au](mailto:adriane.whiley@nswports.com.au).

Yours sincerely,



Adriane Whiley  
**Planning Officer**

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<sup>3</sup> NSW Ports, *Navigating the Future*, Pg.65, 2015