

NSW GOVERNMENT Planning & Infrastructure

1 0 DEC 2013

DEVELOPMENT ASSESSMENT SYSTEMS AND APPROVALS RECEIVED

30 October 2013

Mr S Haddad Director General Department of Planning and Infrastructure 23-33 Bridge Street SYDNEY NSW 2000

Dear Mr Haddad

RE: Revised SIMTA Intermodal Terminal Facility – Environmental Assessment

I refer to the recent exhibition of a revised proposal for the SIMTA site at Moorebank and wish to thank the Department for its agreement to a short extension of time within which to lodge the Council's submission. As you may appreciate, the proposal raises potentially significant issues. I have to advise that Council objects to the proposal for a range of reasons.

The current proposal represents an amended form of the development to which Council has previously responded (letters dated 25 May and 18 October 2012), outlining its significant concerns over potential road and infrastructure implications of the Intermodal Terminal for the City of Campbelltown.

Council is concerned that, having reviewed the proposal as currently presented, these concerns do not appear to have been addressed at all, either in terms of an additional analysis to assess the issues raised by Council or in additional commitments to ameliorate adverse impacts.

Council recognises the *potential* benefits the concept of an appropriately sited intermodal terminal can offer in terms of promoting the value of Port Botany to the regional and national economy, helping remove heavy vehicle traffic from the road network in favour of bulk cargo transport by rail and improving regional air quality.

However, Council remains concerned that, without adequate assessment of the off-site impacts of the SIMTA terminal and consequent commitments to appropriate infrastructure and processes to deal with these impacts, the full benefits of the terminal will not be realised and unnecessary adverse effects will be imposed on the local and regional community in accommodating the terminal and associated traffic.

The SIMTA proposal has been assessed in detail as part of a review of the Environmental Assessment commissioned by Council, in light of a range of strategic planning initiatives being progressed by the State Government and in light of potential local environmental and

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operational impacts of the terminal on the City of Campbelltown. A copy of the assessment is attached to this letter. Key elements of the assessment are summarised below.

Council requests that the issues raised below be considered carefully by the Department of Planning and Infrastructure in assessing the proposal. It is considered that some of the issues raised need to be satisfactorily resolved prior to any concept approval being granted. Other issues may, however, be better dealt with as conditions in the event of any approval being granted.

Key issues

- Rail access from the Southern Sydney Freight Line needs to be constructed prior to any commencement of terminal operations. Importantly, arrangements for rail access to the site from the Southern Sydney Freight Line must be secured prior to the submission of any Project Approval applications.
- Road traffic implications of the proposal need to be re-examined in close consultation with Council, and in light of admissions by the Government's own Transport and Infrastructure agencies that the off-site road impacts remain to be defined. In this regard, it is noted that the proposal relies on an implicit assumption that road traffic to and from the terminal will use Moorebank Avenue to the exclusion of any other means of access, such as Cambridge Avenue. Council does not agree with this view, as emphasised in its previous submissions. The upgrade of Cambridge Avenue as previously identified by Council and the construction of a connecting road between Glenfield and the M5 need to be required as part of any approval, in order to assist in the management of likely traffic impacts on the local Campbelltown community.
- The responsibility for identifying the nature and extent of, and constructing, essential off-site infrastructure has not been clearly established, based on published comments of the Government's own Transport and Infrastructure agencies. Without timely commitments to putting this infrastructure in place, approval of the terminal would not be appropriate.
- The broader implications of introducing a major new development such as SIMTA Terminal into the existing urban fabric, must be examined. Council seeks a commitment from the State Government to assess these implications so as to maximise the benefit of the terminal to the local area.
- In the event of any approval being issued, appropriate conditions must be imposed to control noise and dangerous goods transport. Whilst the Impact Assessment carried out for the proponents suggests off-site noise and dangerous goods transport impacts will not adversely affect the City of Campbelltown, this assessment has been carried out in the context of terminal generated road traffic using Moorebank Avenue. As noted above, Council contends that this is not a valid assumption. Accordingly, noise assessments and controls over dangerous goods transport need to be re-visited in the context of a re-assessment of road network usage.
- Council notes that, in the event of approval, the proponent has committed to carrying out noise monitoring once the terminal is in operation. There is, however, no consequent commitment to carrying out amelioration works if that operational monitoring shows that to be necessary. This must be addressed in the event of any approval.

In the event of approval, appropriate conditions need to be imposed to control the visual impact of the proposal on the City of Campbelltown

As previously indicated, Council objects to the current proposal, however would seek to meet with you to discuss the issues raised above in detail. In this regard, I would invite you to contact me to arrange a mutually convenient time to meet.

Yours sincerely

Paul Tosi General Manager

REVIEW OF SIMTA TRANSITIONAL PART 3A CONCEPT APPLICATION FOR CAMPBELLTOWN CITY COUNCIL



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EXECUTIVE SUMMARY

The current SIMTA proposal for a major Intermodal Transport Terminal at Moorebank is a revised version of a proposal originally presented for public comment in 2012. The proposal seeks a Concept Approval for the Terminal and a rail link to the Southern Sydney Freight Line, with later individual Project Approvals for specific aspects of the terminal.

Council commented on the original proposal, both in response to the exhibition of the draft proposal and in response to a Preferred Project Report drawn up by the proponent taking public submissions into account. Council's principal concerns revolved around transport and infrastructure implications of the proposal.

In order to deal with these concerns, Council sought the following:

- The rail link to/from the Southern Sydney Freight Line to be constructed and operational prior to commencement of any operations at the SIMTA site.
- The Cambridge Avenue Georges River crossing to be upgraded as a dual carriageway crossing for heavy vehicles and at a height that precluded its closure during rain periods.
- A new road link between the Glenfield Road overbridge and Campbelltown Road be constructed to ensure that the traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.

Council noted that the traffic impact arising from trucks leaving the terminal to distribute goods needed to be investigated and that localised freight distribution hubs could be developed to help manage local traffic impacts, with any road upgrade costs to be met by the proponent.

Council also drew attention to the potential synergistic effects of facilities such as the Macarthur Intermodal Shipping Terminal (MIST) and SIMTA may have. Council requested this issue be given detailed consideration and any resultant costs (eg additional road traffic impacts) be met by the proponents rather than Council.

Council observed that it would be appropriate for essential road upgrades to be at the expense of the proponents and that this commitment could be secured by way of a Voluntary Planning Agreement. Council sought the inclusion of the Cambridge Avenue extension and flood upgrade to be included in any Agreement.

It does not appear that any of the additional work undertaken to assess traffic impacts has dealt adequately with these requests.

Since Council's previous comments on the proposal, a number of Strategic Planning documents have been released by the State Government, either in draft or final form, which have a bearing on the SIMTA proposal. They serve to reinforce concerns over the broader infrastructure implications of the proposal and the Government's commitment to dealing with these implications.

Infrastructure NSW has commented that, without investment in facilities such as intermodal terminals, road freight will continue to out-compete rail for port traffic but that investment in intermodal terminal capacity at Moorebank could be considered premature, pending verification that such facilities will in fact be fully utilised, especially by rail rather than road based transport.

Council needs to be assured that, if the SIMTA proposal proceeds in the short to medium term, all essential on- and off- site infrastructure upgrade needs, including rail and road, are met in a timely fashion. Delay in provision as intimated by INSW should be opposed.

The need to clarify road upgrade needs is emphasised by Transport for NSW in its Draft Freight and Ports Strategy and its Long Term Transport Management Plan. TfNSW expects that the development of intermodal terminals in the Moorebank precinct will place significant strain on the surrounding local road network but notes that not all effects of terminal developments have been identified at this time.

TfNSW states that it will work with the Australian Government on a road access strategy for the intermodal terminal precinct and that it has prepared a submission to undertake modelling and economic analysis to determine the optimal road upgrade package to meet the needs of the developed Moorebank intermodal terminal precinct. This clearly indicates that the extent and nature of necessary road upgrades is not yet known.

RECOMMENDATION ONE

a)Concept Approval not be granted unless and until delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line is secured.

b)Alternatively, in the event that Concept Approval is granted, that approval become inoperative if the link is not secured within an appropriate timeframe or the lodgement of individual Project Applications be prevented unless and until delivery of the rail link is secured.

RECOMMENDATION TWO

Council be consulted directly by RMS with a view to satisfactorily determining the potential traffic implications for roads other than Moorebank Avenue, such as Cambridge Ave, from terminal operations on the SIMTA site, together with synergistic effects from the operation of SIMTA and other major transport related operations in the vicinity, prior to any approval being granted to the SIMTA proposal.

RECOMMENDATION THREE

The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately timed upgrade works to Cambridge Avenue to dual carriageway, 1 in 100 year flood free access standard prior to commencement of any intermodal operations on the SIMTA site.

RECOMMENDATION FOUR

The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately timed construction of a new road link between the Glenfield Road overbridge and Campbelltown Road to ensure that the traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.

RECOMMENDATION FIVE

Council seek assurances from the State Government and proponents prior to granting of any approval that all essential on- and off- site infrastructure needs arising from the SIMTA proposal are identified and met in a timely fashion at no cost to Council, with clear responsibilities established for individual components of the infrastructure task.

The Moorebank Intermodal proposal represents the incorporation of a major new facility into an existing urban setting. Surrounding areas have not been planned and developed with the location of a terminal at Moorebank in view. Arising from the lack of detail surrounding traffic and transport implications of the proposed terminal, the implications of the terminal for surrounding land uses are unclear.

RECOMMENDATION SIX

In order to ameliorate any impacts of, and maximise any positive potential from, the SIMTA proposal, Council request the State Government to enter into discussions with Council prior to, or accompanying, any approval as to implications of the terminal for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive spinoffs of the terminal for the local area.

The Impact Assessment recommends that detailed noise assessments be undertaken at each development application stage to confirm the need for, and extent of, any noise mitigation measures required.

RECOMMENDATION SEVEN

Council request the State Government to ensure that appropriate noise monitoring is conducted in the City of Campbelltown to ensure any adverse impacts are identified and managed accordingly.

The IA Report makes a number of other recommendations to help control any noise impacts.

RECOMMENDATION EIGHT

Council request the State Government impose all noise control related conditions proposed at p76 of the IA Report and accepted by the proponent in its Draft Statement of Commitments (p174 of the IA Report) in the event the proposal is approved.

RECOMMENDATION NINE

Council request the State Government impose a condition requiring the proponent to undertake necessary ameliorative works if monitoring of operational noise impacts indicates adverse impacts on off-site properties.

RECOMMENDATION TEN

Council be consulted in detail as to potential traffic routes into and out of the terminal in order to be satisfied that local noise impacts can, and will, be adequately managed.

Claims of broad scale air quality improvements arising from the SIMTA proposal would only be realised if appropriate transport infrastructure is put in place to support the terminal. This is not yet assured. In addition, local air quality impacts in the Campbelltown area have not been assessed based on an assumption that traffic will not use the local network. This is not assured.

RECOMMENDATION ELEVEN

Council seek assurances from the State Government that appropriate transport infrastructure will be put in place at the right time to ensure acceptable local and regional air quality outcomes.

Depending on activities carried out on the SIMTA site subsequent to any approval, there is a potential for impact on areas of Campbelltown City. Risks could arise from the nature of goods transported to and from, and stored on, site, asbestos from demolition and removal of existing structures and bushfire impacts.

RECOMMENDATION TWELVE

In the event that the proposal proceeds to subsequent detailed project approval stages, stringent conditions should be applied to control any asbestos materials found on site. Council should be consulted in this regard to ensure that, if off-site transportation of asbestos is proposed to use any of the Campbelltown road network as part of any demolition program, this is carried out in a manner designed to eliminate any residual risk to Campbelltown residents.

RECOMMENDATION THIRTEEN

In the event that the proposal proceeds to subsequent detailed project approval stages, stringent conditions should be applied to control dangerous goods. As a first step, measures proposed in the IA report (pp92-3) and accepted by the proponent in its Draft Statement of Commitments (pp176-7 of the IA Report) should be applied to any Concept Approval. Council must be consulted during the development of such

measures so that, where relevant and particularly if the local Campbelltown road network is used to transport any such material, Council can be aware of, and be in a position to manage, any situations which may arise.

There is the potential for cumulative impact on local visual amenity if other intermodal and related proposals proceed in future.

RECOMMENDATION FOURTEEN

Council seek a commitment from the State Government that it will be consulted on any additional proposals in the Moorebank precinct so that Council is in a position to assess the visual impact of these proposals in order to protect the interests of its residents.

INTRODUCTION AND COUNCIL'S ROLE IN THE APPLICATION

The SIMTA proposal was originally lodged under Part 3A of the Environmental Planning and Assessment Act 1979 seeking Concept Plan Approval by the Minister for Planning. The proposal is now being assessed as a Transitional Application following repeal of the Part 3A provisions in 2011. The application relates to land within the Liverpool Local Government Area, but in close proximity to the north eastern boundary of the City of Campbelltown.

The revised application is on public exhibition until 21st October 2013. Council has been advised of the exhibition and invited to lodge a submission if it wishes. It has also been invited to supply recommended conditions of approval by that date, in the event the proposal is approved.

Campbelltown City Council is entitled to lodge a submission on the application but has no right of appeal in the event that it is dissatisfied with the outcome of the application given that the application is only for Concept Approval.

If Concept Approval is granted, further detailed project approvals would be required before individual components of the overall proposal could proceed. This may provide Council with additional opportunities to identify and address concerns in relation to the overall proposal on a staged basis, as discrete components of the overall project are addressed in detail.

It is noted that the Director General's Requirements issued to guide the preparation of the SIMTA Environmental Impact Assessment did not specifically require consultation with Campbelltown City Council, even though the location of the site is close to the Campbelltown/Liverpool Boundary, with proposed transport links (rail) adjoining Campbelltown City and potential traffic impacts on the City of Campbelltown.

THE PROPOSAL

• The Original SIMTA Proposal

The original SIMTA proposal was exhibited for public comment in early 2012. The application sought concept approval for development of an intermodal terminal facility with warehouse and distribution facilities.

The proposal comprises the following key components:

- An Intermodal Terminal Facility, providing a port-shuttle freight rail service between Port Botany and the SIMTA site. The Intermodal Terminal Facility proposes to provide capacity for up to approximately one million containers (twenty-foot equivalent units or TEU) throughput per annum, accommodating the forecast catchment demand for Western and South Western Sydney.
- Rail Corridor a nominated rail corridor which is proposed to accommodate a 30 metre wide rail link to connect the SIMTA site with the Southern Sydney Freight Line. An indicative rail alignment was included in the Concept Plan Environmental Assessment. The detailed design of the rail link would be subject to a further Project Approval application and approval process.
- Intermodal Terminal the terminal is proposed to include on-site freight rail sidings of up to 1,200 metres in length to accommodate local freight trains to Port Botany. Freight would arrive by rail and be transported to the warehouse and distribution facilities within the SIMTA site, or be directly loaded onto trucks for transport to warehouses and nearby logistics centres. Exports and empty freight containers would be transported to the facility by truck and then loaded onto rail for transport back to Port Botany. The terminal is expected to contain four rail sidings, with areas for container handling and storage.
- Warehouse and Distribution Facilities approximately 300,000sqm of warehouses with ancillary offices would be constructed to the east of the intermodal terminal. These buildings were proposed to be constructed in stages in response to site servicing availability and market demands. It was expected that warehouses will range in size, depending on tenant needs.
- Freight Village approximately 8,000m2 of support services are proposed to be provided on site. These may include site management and security offices, meeting rooms, driver facilities and convenience retail and business services.

• Council's Submission on the Original SIMTA proposal

CCC made a submission dated 25 May 2012 on the earlier SIMTA proposal. (See Attachment 1). Council advised it did not support the proposal given the range and extent of potential impacts associated with the proposal. These included:

 Uncertainty surrounding the construction of the necessary rail link to the development with the potential for additional road traffic if containers were unable to be delivered by rail. Council recommended that if the application were approved, the following condition should be applied:

The rail link to/from the Southern Sydney Freight Line is to be constructed and operational prior to commencement of any operations at the SIMTA site.

 Adverse impacts on the local road network, particularly Cambridge Avenue and Glenfield Road, from truck traffic trying to access the M7 and F5. To overcome these problems, Council sought the imposition of two specific conditions:

The Cambridge Avenue Georges River crossing shall be upgraded such that it is suitable for the dual carriageway crossing of heavy vehicles and at a height that precludes its closure during rain periods.

That a new road link between the Glenfield Road overbridge and Campbelltown Road be constructed to ensure that the traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.

- Investigation of the Moorebank Road access for the development noting that it was not a public road at that time
- Potential noise impacts from the movement of trucks, trains and containers
- Potential increase in NOx and particulate emissions
- o Relationship to a similar development being planned for adjacent land

• Preferred Project Report

Following consideration of submissions lodged on the original proposal, SIMTA prepared a Preferred Project Report (PPR). Council responded to the PPR by letter dated 18 October 2012. (See Attachment 2).

Council noted that it was generally satisfied with the response to the issues raised by Council, but it remained very concerned over traffic impacts on the Campbelltown area, given the 24 hour operation of the terminal and potential noise and vehicular numbers likely to be generated by the development. Council noted that traffic impact arising from trucks leaving the terminal to distribute goods was *"unclear at best....[and].... must be investigated prior to the issue of any consent".*

Council noted that the extension of Cambridge Avenue to Campbelltown Road could assist with ameliorating some traffic impacts but emphasised that there was no commitment of funds to enable this work. Regardless of this extension, Council maintained that the Cambridge Avenue crossing of the Georges River needed to be upgraded to secure access during major flood events.

Council stressed the accelerated deterioration to its local road infrastructure likely to result from additional heavy traffic sourced from the terminal and requested that

localised freight distribution hubs be developed to help manage local traffic impacts, with any road upgrade costs to be met by the proponent.

Council also drew attention to the potential synergistic effects of facilities such as the Macarthur Intermodal Shipping Terminal (MIST) and SIMTA may have. Council requested this issue be given detailed consideration and any resultant costs (eg additional road traffic impacts) be met by the proponents rather than Council.

Council observed that it would be appropriate for essential road upgrades to be at the expense of the proponents and that this commitment could be secured by way of a Voluntary Planning Agreement. Council sought the inclusion of the Cambridge Avenue extension and flood upgrade to be included in any Agreement.

<u>Current Proposal</u>

SIMTA has now lodged a revised proposal for the intermodal terminal. The revised proposal is on public exhibition until 21st October 2013.

Documentation provided in support of the revised proposal indicates a number of changes have been made to the earlier proposal to address concerns raised in submissions. The changes relate, in the main, to adjustments to rail design both within, and external to, the site.

Crucially, in relation to the concerns raised consistently by Council, documentation for the revised proposal suggests that traffic implications of the SIMTA development will have only localised impact within a "core area" around the site. It is not clear what modelling has been carried out to assess implications (eg) for Cambridge Avenue as requested by Council. It is imperative that this deficiency be addressed in direct discussion with Council. In this regard, it would appear that the consultants who prepared the *"Transport and Accessibility Impact Assessment"* (Hyder) did not consult with Council as part of their work (see list of agencies consulted at p4 of Appendix F to the Impact Assessment).

In addition to the above deficiency, the Director General's Requirements for the Impact Assessment included the following issue in relation to Transport and Access:

(d) cumulative impacts, particularly with regard to existing and proposed freight distribution facilities in the locality and potential cumulative mitigation measures.

The Impact Assessment Report purports to have examined this issue in Sections 6.9 and 8 of Appendix F (p137 of Appendix F). Inspection of these sections however reveals that they only deal with regional traffic and network improvement and mitigation measures. Contrary to the request by Council noted above, there is no reference to synergistic effects with other freight facilities such as MIST or the Ingleburn rail siding, or indeed a potential second intermodal terminal adjacent to the SIMTA proposal, all of which could have a crucial impact on Council's road system if not adequately supported by appropriate off site infrastructure.

As such it is considered that the assessment has not adequately either Council's concerns or the Director General's Requirements in relation to this issue.

STRATEGIC CONTEXT

The Moorebank location, within which the SIMTA development is proposed, is recognised by the State Government as having considerable strategic significance with potential to house major intermodal transport facilities. The following section of this review report canvasses the treatment of this location in the range of strategic planning documents issued by the State Government in the last two years.

<u>State Infrastructure Strategy [SIS] (2012)</u>

Infrastructure NSW (INSW) delivered the SIS in late 2012. Considerable commentary is devoted to the freight task arising from Port Botany -

The vast majority of the freight task in and out of Port Botany is handled by road transport....[but]..... the Government is targeting to increase the proportion of freight moved by rail from the Port.

Shifting freight onto rail has proven difficult. Major investment is underway by the Federal Government and private sector to expand the capacity of the State's rail and intermodal infrastructure on the basis that the increased volumes this infrastructure will support will make rail freight a more viable alternative. (p52)

This indicates that, without investment in facilities such as intermodal terminals, road freight will continue to out-compete rail for port traffic.

INSW goes on to observe that

emphasis has been placed on getting more port containers to move by rail, taking advantage of available capacity on the rail network. This has proven challenging because road freight has been cheaper and more reliable for the shorthaul journeys that make up most port container movements. The forthcoming opening of the Enfield Intermodal Terminal offers a test case for the shorthaul rail freight market in Sydney. (p118)

This would appear to suggest that investment in intermodal terminal capacity at Moorebank could be considered premature, pending verification that such facilities will in fact be fully utilised, especially by rail rather than road based transport.

INSW further comments that

even under optimistic projections of modal shift to rail, road will remain the dominant mode for Port Botany freight traffic, and the majority of freight growth over the next 20 years will be conveyed by road.....Even were rail to reach a 40 percent mode share by 2031, road travel will still more than double during this period. The complexities and constraints presented by Port Botany's location, along with its forecast rapid growth....suggest that both modes will need to substantially increase the volumes they carry to ensure the efficiency of the port supply chain over the next 20 years. Greater focus should be given to accommodating container freight movements by road. This is because road freight will remain the dominant mode. (pp 120-121)

Nevertheless, INSW recognises that, if rail is to increase its mode share,

the major infrastructure requirement identified to increase the proportion of container freight that moves by rail is investment in intermodal capacity..... The private sector and the Commonwealth Government have separate schemes for a major intermodal terminal at Moorebank in Sydney's South-West.....

Infrastructure NSW is supportive of the intermodal concept.....[but]..... recommends that State public funding for additional intermodal terminal capacity in Sydney (including in relation to supporting infrastructure) be minimised until there is greater clarity on whether the short-haul rail freight market is viable.

This approach does not contradict either of the proposed developments in the Moorebank Precinct, where project investors propose to fund immediate supporting infrastructure (for example rail lines and precinct roads). Until these facilities demonstrate commercial viability, it would be imprudent to commit significant State capital in wider infrastructure upgrades. Infrastructure NSW assumes that (in line with proponents' estimates) Moorebank will be developed over the next five years. It is likely that major investment in supporting infrastructure around this precinct, given ramp up, will not be required until after 2017. (p124) On p129, INSW notes this supporting infrastructure is estimated to cost \$300million. (Emphasis added)

Given the above comments offered by INSW, Council needs to be assured that, if the SIMTA proposal proceeds in the short to medium term, <u>all essential on- and offsite infrastructure upgrade needs are met in a timely fashion</u>, whether by the proponent or the State. Delay in infrastructure provision as intimated by INSW should be opposed – instead the approach taken by Council in its submission on the original proposal (securing essential upgrades prior to operations commencing) should be pursued vigorously.

In this regard, it is noted that the project proponents only propose to carry out road upgrade works related to Moorebank Avenue (see Statement of Commitments pp 172-3 of IA Report). Council's professional staff have observed that it is unrealistic to assume that traffic exiting or accessing the terminal will all use Moorebank Avenue and that Cambridge Avenue will also be used, with consequent impacts on Campbelltown's road network, and that this situation is likely to be exacerbated by the interplay of traffic between SIMTA and other terminals in the area which is likely to be road rather than rail based. In addition, the proponents commit to the delivery of the rail connection between the Southern Sydney Freight Line and the SIMTA site *"in the detailed application for the first stage of works."* (IA Report, p172). The IA Report notes that details of the rail infrastructure and its operation, an assessment of its environmental impact, its compatibility with the wider rail network and consultations required with other entities are yet to be conducted. As such, the delivery of the rail connection appears by no means assured.

Rather than considering this aspect of the proposal as part of the first stage of works, it may be more appropriate to consider it as a "condition precedent" without which any overall approval should be withheld or become inoperative if the link is not secured within an appropriate timeframe. Alternatively, in the event that Concept Approval is granted, the lodgement of individual Project Applications should be prevented unless and until delivery of the rail link is secured.

• Draft Freight and Ports Strategy [DFPS] (2012)

In November 2012, the State Government released the DFPS for comment. It is understood that the Strategy is close to finalisation by Government following receipt of public comment.

The DFPS views the Moorebank Intermodal as a key infrastructure project (p82) with operations due to begin between 2015 and 2017 subject to approval and access (p71).

The DFPS sets as one of the its tasks (p100) to

foster intermodal terminals in Metropolitan areas.

It goes on to state that (p100)

Transport for NSW will support the development of sustainable facilities that create network capacity by:

• Supporting ARTC's completion of the Southern Sydney Freight Line to connect the proposed intermodal facilities at Moorebank to the Metropolitan Freight Network

.

• Supporting the development of new intermodal facilities at Moorebank by identifying road upgrade requirements

The primary function of metropolitan intermodal terminals is to facilitate the import container trade. In this context, intermodal terminals function like inland satellite ports......Consideration of complementary road upgrades is usually necessary to support these new terminals. The DFPS sets out its targeted outcome as follows:

The development of new intermodal terminals in Moorebank will occur on sites that are supported by dedicated rail freight lines and adequate road connections. Rail lines to Port Botany will avoid interaction with passenger services on the RailCorp network and facilitate 24 hour port, rail and terminal operations. (p100).

As part of any submission on the current proposal, Council needs to seek assurance that this off site support infrastructure is in place to support the operation of the terminal at its outset. Whilst it is noted that the proponents propose to fund road upgrades relatively immediate to the site, more distant road impacts are not adequately addressed in the material available (see above discussion).

The importance of the Moorebank Intermodal precinct is emphasised in the DFPS by being identified specifically as a Case Study site (p101). It notes that there are two proposals for intermodal terminals at Moorebank – one by the Commonwealth Government and the current proposal by SIMTA. Importantly,

TfNSW expect the development of these two intermodal terminals in the Moorebank precinct to place significant strain on the surrounding local road network. While not all effects of terminal developments have been identified at this time, initial analysis suggests the following impacts to the local road network:

• Travel demand on the section of the M5 Motorway between the Hume Highway at Casula and Moorebank Ave is expected to exceed capacity as early as 2016.

• The absence of west facing ramps from the M5 to the Hume Highway results in a significant number of vehicles using Moorebank Avenue to access the Liverpool CBD.

• By 2026 growth in background traffic will result in peak spreading and traffic conditions similar to the existing peak period in the Liverpool area and on the M5, persisting for most of the day.

• Key intersections providing access to the Moorebank intermodal precinct will exceed capacity with volumes, especially of turning vehicles, resulting in extensive delays, with queuing sufficient to disrupt through movement.

To support the development of the Moorebank intermodal terminals and meet the challenges posed by impact on the local road network, TfNSW is seeking to provide road network upgrades. The specific goals of these upgrades include:

• Providing additional capacity and traffic reliability on key routes accessing the precinct.

• Ensuring full access to the precinct for High Productivity Vehicles (HPV), including Higher Mass Limit (HML) vehicles.

• Managing the needs of the precinct in terms of road access while addressing negative externalities for the surrounding community and environment.

The DFPS indicates that

TfNSW has prepared a Nation Building 2 submission to undertake modelling and economic analysis to determine the optimal road upgrade package to meet the needs of the developed Moorebank intermodal terminal precinct (p101).

It is clear from this commentary that the implications for wider road upgrades to support the Moorebank site are as yet unknown. This view would be supported by reference to the Impact Assessment itself as noted previously. Also, contrary to the assertion by INSW that upgrades are to be funded by the private proponents and cautioning against investment of public funds until viability is proven, the DFPS appears to suggest that, at least initially, TfNSW is to undertake work to determine the need for road upgrades.

It is essential that this apparent contradiction is addressed to Council's satisfaction firstly by the guarantee that approval is not granted prior to determination of necessary infrastructure upgrades more remote from the site and secondly that construction of those necessary facilities is secured prior to commencement of operations of the SIMTA proposal.

Concerns over the road and traffic implications of intermodal terminals at Moorebank were stressed in Council's submission on the DFPS dated 5 March 2013 (see Attachment 4).

• Long Term Transport Master Plan [LTTMP] (2012)

The LTTMP is a relatively high level view of transport planning needs for the whole of NSW over the next twenty years. Nonetheless, it contains specific, if broad, commentary on the Moorebank Intermodal site. It notes the importance of such terminals to delivering freight by rail close to major road links and end users, in the process freeing up Port Botany capacity to operate more efficiently (p278).

The LTTMP notes in relation to Moorebank that

development of the Moorebank intermodal container terminal precinct will have impacts on the local road network. Initial analysis suggests that traffic on the M5 (between the Hume Highway (M31) at Casula and Moorebank Avenue) could exceed capacity as early as 2016, and capacity will be exceeded at key intersections that provide access to the precinct. We [TfNSW] will work with the Australian Government on a road access strategy for the intermodal terminal precinct (p295).

This reinforces the view expressed above that the road infrastructure implications of intermodals at Moorebank are not well understood. It is imperative that such impacts are comprehensively examined and a program in place to adequately address any concerns prior to approval being granted for any intermodal terminal at Moorebank.

The concerns set out above in relation to the strategic context of the SIMTA proposal are addressed in the following recommendations:

RECOMMENDATION ONE

a)Concept Approval not be granted unless and until delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line is secured.

b)Alternatively, in the event that Concept Approval is granted, that approval become inoperative if the link is not secured within an appropriate timeframe or the lodgement of individual Project Applications be prevented unless and until delivery of the rail link is secured.

RECOMMENDATION TWO

Council be consulted directly by RMS with a view to satisfactorily determining the potential traffic implications for roads other than Moorebank Avenue, such as Cambridge Ave, from terminal operations on the SIMTA site, together with synergistic effects from the operation of SIMTA and other major transport related operations in the vicinity, prior to any approval being granted to the SIMTA proposal.

RECOMMENDATION THREE

The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately timed upgrade works to Cambridge Avenue to dual carriageway, 1 in 100 year flood free access standard prior to commencement of any intermodal operations on the SIMTA site.

RECOMMENDATION FOUR

The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately timed construction of a new road link between the Glenfield Road overbridge and Campbelltown Road to ensure that the traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.

RECOMMENDATION FIVE

Council seek assurances from the State Government and proponents prior to granting of any approval that all essential on- and off- site infrastructure needs arising from the SIMTA proposal are identified and met in a timely fashion at no cost to Council, with clear responsibilities established for individual components of the infrastructure task.

The LTTMP includes a short term action (p299) to improve

integration of land use and freight planning.

It indicates that TfNSW

will engage with industry, the community and local councils to develop effective guidelines, information sharing and best practice partnerships on land use planning for freight. These initiatives will seek to resolve issues around local access and ensure that planning decisions about the location of businesses, services and housing developments also consider freight logistics needs and network implications. The aim is to maximise the existing freight network, minimise conflicts between local and freight traffic where possible, and promote the development of more efficient supply chains and transport access in local areas by preventing encroachment by incompatible development and sensitive land use (p299).

The action is aimed at facilitating the operation of intermodal freight facilities by, for example, preventing encroachment by incompatible development.

In contrast, the Moorebank Intermodal proposal represents the incorporation of a major new facility into an existing urban setting. As such, Council should seek detailed discussions with the State Government prior to, or accompanying, any approval as to implications of the terminal for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive spinoffs of the terminal for the local area.

This issue was addressed at length in Council's submission on the Draft LTTMP (22 October 2012) (see Attachment 3) where a range of concerns related to the integration of land use planning and transport planning and infrastructure were set out. The SIMTA proposal serves to highlight the need for the State Government to engage with Council in a detailed and meaningful fashion to deal with the

significance of transport issues facing South Western Sydney in general and Campbelltown in particular.

• Draft Metro Strategy [DMS] (2013)

The DMS aims

to protect metropolitan-significant infrastructure including intermodal terminals (p95).

The DMS notes that the LTTMP

sets out the approach and actions to integrate, modernise and grow Sydney's transport infrastructure network. The Metropolitan Strategy for Sydney will maximise the productivity advantages of transport investment with supporting land use that delivers strong economic returns and improves Sydney's amenity and way of life. (p54)

The SIMTA proposal, if it were to proceed, represents the retrofit of a major facility into an existing urban fabric, rather than the integrated forward planning of such a facility together with its surrounding land uses (as noted above in commenting on the LTTMP). As such, the State Government should be asked to commit to detailed discussions with Council regarding the future of the area in the vicinity of the Moorebank proposal, both to ameliorate any adverse impacts and to capitalise on the employment opportunities which may also arise from the operation of the facility.

Importantly this should involve detailed discussion with Government and operators of the range of transport related facilities in the vicinity, including MIST and the Ingleburn siding and the Southern Sydney Freight Line in order to promote coordinated operations and so maximise their benefit to both Campbelltown and the wider Sydney economy. Such co-operative discussions are in fact foreshadowed in the DMS – see for example Action 27.3 (p74) which indicates that planning for the Moorebank Intermodal in order to deliver efficient freight connections should be led by TfNSW but involve Local Councils.

As with other State Government planning initiatives, Council made a submission on the Draft MPS (8 May 2013) (see Attachment 5) emphasising the essential link between appropriate and timely infrastructure investment and successful urban growth. Council expressed its concern over the lack of detail in the Draft as to investment in major infrastructure or employment creation initiatives to support equitable growth in the Campbelltown Macarthur area. This lack of detail is highlighted when a specific project such as the SIMTA proposal is considered. Whilst the Draft MPS makes clear reference to the importance of the project there is no detail as to whether and, if so, how it can be accommodated to best advantage in the region. This issue requires detailed engagement with Council in order to achieve the best possible outcomes.

RECOMMENDATION SIX

In order to ameliorate any impacts of, and maximise any positive potential from, the SIMTA proposal, Council request the State Government to enter into discussions with Council prior to, or accompanying, any approval as to implications of the terminal for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive spinoffs of the terminal for the local area.

LOCAL IMPACTS

Transport infrastructure impacts of the SIMTA proposal have been discussed above. This section of this report examines local potential impacts of the SIMTA proposal as they may affect the City of Campbelltown. Issues examined are noise and vibration, air quality, storm water and flooding, biodiversity, hazards and risks and visual impact. Other potential local impacts may exist (such as site contamination and heritage) but these are site specific and would not be considered to impact adversely on Campbelltown.

Noise and Vibration

Potential noise and vibration impacts of the SIMTA proposal were assessed by measuring existing background characteristics at a number of off-site locations, then modelling noise and vibration generation from assumed worst case operational scenarios and comparing the results to accepted EPA criteria. It is noted that the Director General's Requirements did not specifically require impacts to be assessed in Campbelltown City, however the proponent carried out monitoring in Glenfield.

The assessment indicates that operational noise impacts are forecast to exceed criteria at only one site in Liverpool, with the need for a noise barrier in that location to be assessed in detail when the relevant project approval is sought for full capacity use of the site. Noise is not forecast to exceed criteria at the Glenfield site.

The assessment goes on to indicate that sleep disturbance from transient noise events, road traffic noise and rail noise all comply with criteria and need no further assessment. Construction noise is forecast to exceed relevant criteria at one site in Liverpool but not at Glenfield. Vibration arising from construction is not forecast to cause any adverse impacts but it is recommended that it be monitored for compliance, during any construction.

The Impact Assessment also indicates that an assessment has been carried out of the noise impact of cumulative operation of the SIMTA and the other potential Moorebank Intermodal Terminal and that the predicted cumulative noise impacts comply with relevant amenity criteria.

Resulting from the above conclusions, the Impact Assessment recommends that detailed noise assessments be undertaken at each development application stage to confirm the need for, and extent of, any noise mitigation measures required. It recommends that operational noise should be monitored *"at nearby receivers…to validate noise models used in these assessments"* [IA, p76]. The Report does not specify which sites should be monitored in this way.

Council should seek to ensure that appropriate monitoring is conducted in the City of Campbelltown to ensure any adverse impacts are identified and managed accordingly. This is all the more important as the forecast noise impacts are only predictions based on modelling and actual impacts could vary given factors such as atmospheric conditions, the nature of equipment used on site etc.

In addition, depending on the routing of traffic into and out of the terminal, noise impacts on properties and residents in the City of Campbelltown may be experienced. Given the uncertainty around these traffic flows, possible noise impacts are, as yet, unknown.

The IA Report makes a number of other recommendations to help control any noise impacts [p76] including siting buildings to help shield surrounding areas from noise. These recommendations should be supported by Council in the event the proposal is approved.

The IA Report commits the proponent to carrying out noise monitoring when the terminal is operating *"to validate noise models used in the (later detailed) assessments"* (IA, p174). Whilst the monitoring of operational noise impacts should be required, Council should seek the extension of any related condition to include the carrying out of any amelioration works shown to be necessary as a result of such monitoring.

RECOMMENDATION SEVEN

Council request the State Government to ensure that appropriate noise monitoring is conducted in the City of Campbelltown to ensure any adverse impacts are identified and managed accordingly.

RECOMMENDATION EIGHT

Council request the State Government impose all noise control related conditions proposed at p76 of the IA Report and accepted by the proponent in its Draft Statement of Commitments (p174 of the IA Report) in the event the proposal is approved.

RECOMMENDATION NINE

Council request the State Government impose a condition requiring the proponent to undertake necessary ameliorative works if monitoring of operational noise impacts indicates adverse impacts on off-site properties.

RECOMMENDATION TEN

Council be consulted in detail as to potential traffic routes into and out of the terminal in order to be satisfied that local noise impacts can, and will, be adequately managed.

• Air Quality

The IA sets out existing environmental conditions [p110]. As with noise monitoring, one monitoring site is located within Glenfield. The IA identifies potential air quality impacts of the proposal as [p111] short term pollutant peaks arising from train movements. It indicates that these *"would quickly disperse to concentrationsunlikely to cause exceedance of air quality goals"* [IA, p111]. It goes on to claim that *"the operation of the SIMTA proposal is expected to have a net positive impact on regional air quality and result in an overall reduction in emissions to airshed"* [p111].

This claim is based on the reduction in heavy goods traffic using the M5 as a result of increased usage of rail; a reduction in greenhouse gas emissions is also claimed as a result of increased rail v road transport.

These claims are set within the context of a particular set of transport assumptions. As noted above during the discussion of the strategic context of the SIMTA proposal, the related transport infrastructure outcomes are as yet uncertain. As a worst case scenario, were the SIMTA proposal to proceed without necessary supporting transport infrastructure, it would function as a large road freight terminal with consequent diminution of air quality.

Accordingly, in order for Council to be assured of acceptable air quality outcomes, appropriate transport infrastructure needs to be guaranteed and in place at the right time.

In addition to the above comments, the analysis reported in the IA is broad scale. Assuming rail is used to freight goods into the terminal, depending on the local traffic routes used to distribute goods out from the terminal, there could be specific localised air quality impacts on areas within the City of Campbelltown. The modelling for the proposal reported in the IA only models impacts arising from truck traffic exiting the terminal along Moorebank Avenue to access the M5.

As has already been seen, the off-site traffic modelling has concentrated on areas close to the SIMTA site and the more distant traffic impacts are uncertain and potentially underestimated. As a result it is not possible to assess at this time the nature and extent of potential local air quality impacts arising from heavy transport sourced from the terminal if that traffic uses routes other than Moorebank Avenue.

Council needs to be consulted in detail as to potential traffic routes out of the terminal in order to be satisfied that this issue can, and will, be adequately managed.

RECOMMENDATION ELEVEN

Council seek assurances from the State Government that appropriate transport infrastructure will be put in place at the right time to ensure acceptable regional and local air quality outcomes.

• Storm Water and Flooding

The SIMTA site drains both to the east and west. The western side of the site drains to the Georges River by a concrete channel. The eastern side drains to Anzac Creek which is also within the Georges River catchment.

Council officers advise that the Georges River is a valuable environmental asset within the context of the greater Sydney Basin. The River and its tributaries (including Anzac Creek) provide important habitat for a range of threatened species and vulnerable ecological communities.

The River Health Monitoring Program (Georges River Combined Councils Committee) has recently rated the river health within the area as good, however this rating has been variable over time and is anecdotally dependent on rainfall. River health noticeably decreases downstream from the site.

Drainage modelling in the IA report indicates that, with appropriate on-site measures, drainage flows from the site after it has been developed would be no greater than current flows from the site. These measures would need to be assessed in detail and conditioned as part of any subsequent development approval. Provided this is done, the quantum of water flows from the site should not adversely impact on the City of Campbelltown.

In terms of water quality, potential impacts arising from construction may include *"increased turbidity, reduction in water body temperatures and reduction in dissolved oxygen, detrimentally impacting fish habitat in Georges River..."* [IA, p103] and degradation of aquatic habitats and obstruction to fish passage could arise from activities such as diversion of flows, erosion, removal of shade trees, sedimentation and inappropriate design of structures [IA, p104].

Council officers note that in order to best preserve the river and its associated biodiversity it is recommended that stormwater and runoff be appropriately treated onsite, including the installation and operation of water quality improvement devices such as water sensitive urban design.

Accordingly, with appropriate measures designed and incorporated in any conditions of consent, these impacts would be able to be minimised or eliminated, with no adverse impact on the Georges River or the City of Campbelltown.

• Biodiversity

The SIMTA site is currently occupied by a number of industrial type buildings and associated infrastructure. As such, the biodiversity of the site has already been substantially impacted. Nevertheless, the proposed intermodal terminal and associated rail link to the Southern Sydney Freight Line will impact on two threatened plant species (Persoonia nutans – endangered; Grevillea parviflora subsp parviflora – vulnerable), both of which have been found in the rail corridor land. In

addition, four threatened ecological communities were also identified in the rail corridor land – Castlereagh Scribbly Gum Woodland, Castlereagh Swamp Woodland, River-flat Eucalypt Forest and Freshwater Wetlands. Four threatened bat species were also recorded in the rail corridor lands – Eastern Bent Wing, Southern Myotis, Eastern Free-tail and Grey Headed Flying Fox [IA, pp 82-4].

The assessment concludes that the Persoonia nutans community would be significantly impacted by the proposal and that a Vegetation Management Plan (VMP) should be prepared for management of native vegetation in the study area during and following construction [IA, p 84]. It notes that the VMP should include a Threatened Species Management Plan containing measures to manage impacts, maintain and monitor populations and detail offsetting requirements, with this plan to be further developed through subsequent project approval stages.

Hazards and Risks

Depending on activities carried out on the SIMTA site subsequent to any approval, there is a potential for impact on areas of Campbelltown City. Risks could arise from the nature of goods transported to and from, and stored on, site, asbestos from demolition and removal of existing structures and bushfire impacts.

Asbestos risks can and should be managed as part of any competent demolition program. Accordingly, in the event of subsequent detailed project approvals, stringent conditions should be applied to control any asbestos materials found on site. Council should seek to be consulted in this regard to ensure that, if off-site transportation of asbestos is proposed to use any of the Campbelltown road network as part of any demolition program, this is carried out in a manner designed to eliminate any residual risk to Campbelltown residents.

Control of dangerous goods on, and travelling to and from, the SIMTA site can only be addressed on a case by case basis in the event that the proposal proceeds. The IA [pp 92-3] proposes measures which should be applied to control the potential hazard of materials. It is considered that Council should be consulted during the development of such measures so that, where relevant and particularly if the local Campbelltown road network is used to transport any such material, Council can be aware of, and be in a position to manage, any situations which may arise.

It is not anticipated that bushfire would pose any particular threat to the SIMTA operation provide appropriate building design and layout is used. However, in relation to the dangerous goods issue noted above, specific attention should be taken in regard to controlling any risk which might arise from combustion of such goods and mitigating any adverse impacts distant from the site.

RECOMMENDATION TWELVE

In the event that the proposal proceeds to subsequent detailed project approval stages, stringent conditions should be applied to control any asbestos materials found on site. Council should be consulted in this regard to ensure that, if off-site

transportation of asbestos is proposed to use any of the Campbelltown road network as part of any demolition program, this is carried out in a manner designed to eliminate any residual risk to Campbelltown residents.

RECOMMENDATION THIRTEEN

In the event that the proposal proceeds to subsequent detailed project approval stages, stringent conditions should be applied to control dangerous goods. As a first step, measures proposed in the IA report (pp92-3) and accepted by the proponent in its Draft Statement of Commitments (pp176-7 of the IA Report) should be applied to any Concept Approval. Council must be consulted during the development of such measures so that, where relevant and particularly if the local Campbelltown road network is used to transport any such material, Council can be aware of, and be in a position to manage, any situations which may arise.

• Visual Impact

Given the nature of the existing uses on and around the SIMTA site, the IA indicates that there will be no adverse visual impact of the SIMTA proposal from lands within the City of Campbelltown. It also indicates that control of light spillage could be gained with appropriate design.

The IA does note that there is the potential for cumulative impact on local visual amenity if other intermodal and related proposals proceed in future. Accordingly Council should seek to be consulted on any such proposals in order to protect the interests of its residents.

RECOMMENDATION FOURTEEN

Council seek a commitment from the State Government that it will be consulted on any additional proposals in the Moorebank precinct so that Council is in a position to assess the visual impact of these proposals in order to protect the interests of its residents. Attachment 1 - SIMTA Submission 25 May 2012





25 May 2012

Ms K Seretis Manager – Rail and Ports Projects Department of Planning and Intrastructure GPO Box 39 SYDNEY NSW 2011 Department of Planning Receive 1 3 0 MAY 2012 Scanning Room

Dear Ms Seretis

Re: Exhibition of Environmental Assessment for SIMTA Intermodal Terminal Facility (MP 10/23873)

I refer to the Department's notification of a Concept Application and its accompanying Environmental Assessment (EA) for the SIMTA Intermodal Terminal Facility at Moorebank. Council appreciates the opportunity to comment on the proposal and raises the following issues and matters for further investigation and consideration by the Department. Council is not supportive of the proposal given the range and extent of potential impacts associated with the Development.

1. Conceptual Rail Access

Council notes the rail access proposed to service the development site is conceptual in its nature, with what appears to be limited detailed discussion undertaken with adjoining land owners to ensure that this vital link is constructed as part of the development. The EA's comment that "The final alignment of the rail link will be determined through further design development which will be undertaken prior to lodgement of a subsequent Project Application over the rail corridor land" is not considered satisfactory. The rail link is an absolutely vital component and should be considered as part of the development.

Failure to secure the appropriate rail access must mean that the proposed intermodal facility cannot proceed.

There has been little information provided with the application that provides any security for the link's construction, noting that the EA indicates that the proponent does not own or have access to the land at this point in time.

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Civic Centre Queen Street Campbelltown PO Box 57 Campbelltown NSW 2590 DX5114 Telephone 02 4845 4000 Facsimile 02 4845 4111 TTY 02 4845 4615 Emeil council@campbelltown.nsw.gov.au Web www.campbelltown.nsw.gov.au ABN 31 459 814 087 The uncertainty associated with this link's potential to be constructed and the resultant impact that its non-delivery would have on the numbers of containers delivered/exported by road versus rail, is of major concern to Council.

Accordingly, Council would recommend that any approval of the Application incorporate the following condition:

The rail link to/from the Southern Sydney Freight Line is to be constructed and operational prior to commencement of any operations at the SIMTA site.

2. Impacts on the Local Road Network

Council is aware that as a result of existing work being undertaken in the vicinity of the SIMTA site, the link from Moorebank Avenue to the M7 (via the M5) is currently at or very near capacity. The capacity problem for this portion of the M5 would be exacerbated by the SIMTA proposal as trucks entering and leaving the SIMTA site travel to/from other employment lands and beyond.

Council is very conscious that existing capacity issues with this road link beyond the site would be likely to result in heavy road traffic utilising its roads through Glenfield and Macquarle Fields (including residential areas) in a bid to access the M7 or F5 (Hume Highway) southbound. Particular concern is held by Council over the:

- capacity and suitability of the Cambridge Avenue causeway to accommodate increased heavy vehicle traffic flows given its limited width and height above the Georges River that often results in its regular closure during periods of rain;
- impact of trucks using Cambridge Avenue which is a local road; and
- impact of trucks using Glenfield Road to access the Casula M7 Interchange and Hume Highway/F5 southbound.

Therefore, Council would request that any approval of the application include the following conditions:

The Cambridge Avenue Georges River crossing shall be upgraded such that it is suitable for the dual carriageway crossing of heavy vehicles and at a height that precludes its closure during rain periods.

That a new road link between the Glenfield Road overbridge and Campbelltown Road be constructed to ensure that traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.

3. Other Matters

Council also requests the Department's consideration of the following issues as part of its assessment of the proposal:

- Investigation of the Moorebank Road access for the development noting that it is not a public road at this time;
- Potential noise impacts resulting from the movement of trucks, trains and containers at the site;
- Potential increase in NO_x and particulate emissions from diesel engines (truck and locomotive) in an area known to have poor air drainage; and
- The proposal's relationship to a similar development on the adjoining property along Moorebank Avenue which is presently in the planning/investigation phase.

Council appreciates the opportunity to comment on the proposal and respectfully requests that detailed consideration be given to Council's concerns raised in this letter, particularly with regard to provision of the rail link and the proposal's impact on local roads.

Council would be pleased to elaborate on these matters by means of further discussion with the Department. With this in mind, please contact me on (02) 4645 4575 to make mutually convenient arrangements to meet.

Yours sincerely

Jeff Lawrence Director Planning and Environment

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Attachment 2 - SIMTA Submission 18 October 2012



18 October 2012

Ms K Seretis Manager Ports and Rail Infrastructure Projects Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001

Dear Ms Seretis,

Response to Preferred Project Report for the SIMTA Moorebank Intermodal Terminal Facility Concept Plan (MP10-0193)

Thank you for the opportunity to review and respond to the Preferred Project Report for the SIMTA Moorebank Intermodal Terminal Facility and in particular, the proponent's response to issues raised by Campbelltown City Council.

Upon review of the responses to the issues raised by Council, I can advise that Council is generally satisfied with the response to some of the matters raised and believes that these matters can be adequately dealt with during the development of the site, through the undertaking of further investigation, and with the inclusion of appropriate conditions in any consent that the Minister may issue.

However, it is Council's contention that issues relating to traffic generation and control (particularly within the Campbelltown LGA) remain unresolved.

As stressed in previous correspondence on this matter and at previous proponent forums attended by Council, significant concerns are held with respect to the 24hr operation of the SIMTA terminal and its potential to result in significant adverse impacts on the local infrastructure and community within the Campbelltown Local Government Area, (and in particular) Cambridge Avenue and the surrounding road network, and those people who live or operate businesses within the northern suburbs of the Campbelltown LGA.

It is noted that a response to this issue within the Preferred Project Report (PPR) states that Cambridge Avenue has not been included in the traffic impact assessment as trucks associated with the SIMTA operation are not anticipated to travel south of the site along Cambridge Avenue. It is Council's position that although there will be a major movement of vehicular traffic to and from the site via the M5 Motorway, the 24hr operation of the SIMTA terminal will significantly increase heavy vehicular movements and noise impacts within the Campbelltown LGA and its northern suburbs, and there has been no evidence provided to suggest otherwise. As such, this matter is not considered to have been satisfactorily investigated nor addressed.

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Notwithstanding the major function of the operation being that of road/rail container transference and the movement of containers between Port Botany and the SIMTA terminal, commentary and investigation into the function and role that localised transportation logistics plays and the expected quantum of local deliveries and delivery routes to and from the SIMTA site remains unknown and as such, any understanding of the potential cumulative impacts on the community of the Campbelltown LGA and its road infrastructure, is unclear at best.

This matter is considered to be of high importance and has the potential to have a significant adverse effect on the Campbelltown community and must be investigated prior to the issue of any consent.

Council notes that there is a potential for Cambridge Avenue to be extended through to Campbelltown Road, and accepts that such an extension should relieve some of the pressure/amenity impacts that will result from the operation of the SIMTA terminal. However, as there is currently no real commitment to provide this piece of infrastructure, the fact remains that the south bound traffic will have no other alternative but to permeate through the Campbelltown LGA. Regardless of the outcome of the Cambridge Avenue extension, it is considered paramount that the Cambridge Avenue low level bridge be upgraded to a level that ensures normal and full vehicular access can be maintained during major flood events and that the upgrade adequately caters for the additional traffic volumes arising from the SIMTA operation.

The adverse impact that high volumes of additional heavy vehicular traffic will have on Council's road infrastructure and the high cost to the Council and the community in having to repair/upgrade those roads due to the accelerated deterioration of the road pavement cannot be ignored. For this reason, potential localised freight hubs or commercial/redistribution centres located in close proximity to the SIMTA site must be identified and traffic/freight distribution modelling must be undertaken to ascertain the likely local transport routes, the increased heavy vehicle traffic volumes along those routes and the upgrades required to these roads to ensure that the life expectancy and carrying capacity of these roads is not compromised. All upgrades must be to Council's satisfaction and at the expense of the proponent and not the Council nor its community.

It is of further concern that, in addition to their normal daily operations, existing rail/road freight logistic sites within the Campbelltown LGA (the MIST site in particular) may be used as secondary terminals (or other synergies between similar rail/road freight logistic operations such as MIST and SIMTA may be developed) which in turn will place added strain on the community of Campbelltown and its road infrastructure through the continual movement of heavy vehicles to and from the various sites. This issue must be considered in depth and the likely impacts of localised transportation (e.g. noise 24/7, traffic volumes, pavement deterioration, etc.) directly related to the operation of the SIMTA facility must be investigated and quantified and any impacts remediated by and at the expense of the proponent.

With respect to commitments to the delivery of infrastructure upgrades within the modelled core area, this must be ensured through the appropriate conditioning of any consent issued and should be related to specific thresholds to guarantee that service levels on transport infrastructure are not adversely affected and that impacts on the community are satisfactorily ameliorated. The provision and timing of the various infrastructure upgrades could be better dealt with by way of the Department entering into a Voluntary Planning Agreement with the proponent.

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It is noted that upgrades to the M5, Moorebank Avenue, Newbridge and Heathcoat Roads are planned as part of this project and it is further noted that it is the proponent's intention to upgrade these roads based on maintaining a level of service satisfactory to the relevant government agencies, including the local government authority for the area. It considered essential that these upgrades be undertaken at the earliest of opportunities so as to maintain a satisfactory level of service at all times, and not when the level of service has degraded to a level that forces more heavy vehicles to the south. In this regard, it is essential that Cambridge Avenue and the Cambridge Avenue low-level bridge upgrade form a part of the scheduled infrastructure upgrade list.

Again I would like to thank you for the opportunity to comment on the PPR and I appreciate the additional time you provided Council to respond. If you would like to discuss the above in more detail or require clarification on the matters raised, please don't hesitate to call myself directly on 4645 4575 or otherwise you can call Council's Manager Development Services – Mr Jim Baldwin – on 4645 4616.

Yours sincerely

Jeff Lawrence Director Planning and Environment

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Attachment 3 - Long Term Transport Master Plan Submission 22 October 2012



22 October 2012

NSW Long Term Transport Masterplan Team Transport for NSW GPO Box K659 HAYMARKET NSW 1240

Dear Sir/Madam

Draft NSW Long Term Transport Masterplan

Campbelltown City Council welcomes the preparation of the Draft Long Term Transport Masterplan for NSW by the State Government.

May I take this opportunity on behalf of the Council to express Council's appreciation for the recent briefing on the draft Masterplan by Mr Steve Enticott and other senior officers of Transport for NSW, provided to representatives of the Macarthur Regional Organisation of Councils at Campbelltown on 9 October 2012.

You may also be aware that Council made a detailed submission to Transport NSW on the Discussion Paper that preceded the release of the draft Masterplan, in addition to sending senior staff representatives to a community stakeholder workshop held at St Marys earlier this year.

Whilst there is clearly an extensive range of policy proposals, strategies and initiatives included in the draft Masterplan, this submission will concentrate on a number of key concerns that Council holds with the draft Masterplan. Those concerns are not inconsistent with previous representations made by this Council to:

Transport for NSW;

- Other government agencies including the Department of Planning and Infrastructure; as well as to
- Elected State Government representatives.

There is little doubt that successful transport systems owe much of their success to the integration of transport and land use planning and the subsequent commitment to the delivery of those plans. As with any plan, the assumptions must be robust and governments must demonstrate a willingness to commit to the implementation of a plan with investment in the delivery of critical infrastructure.

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Council holds a firm belief that collaboration between all levels of government (and between multiple agencies within government) is essential in the decision making framework that will allocate planning and delivery resources to the implementation of Land Use and Transport Policy in New South Wales. Campbelltown City Council requests to be part of that collaboration.

Overall, Campbelltown City Council is concerned that the draft Masterplan does not translate the significance of the extent of residential and employment growth that is scheduled to take place in the Macarthur Region over the next 20 years (as expressed in housing and employment targets published by the Department of Planning and Infrastructure) in the identified critical infrastructure upgrades listed in the draft Masterplan.

Council notes and supports the policies of better connectivity between new urban release areas and places of employment and services/facilities. However, Council is disappointed at the absence of any noticeable detail contained within the draft Masterplan, as far as specific commitments that relate to future government investment into a number of critical transport infrastructure items (within the Campbelltown Local Government Area) that deal with what are seen by Council to be regional transport imperatives.

Further, Council believes that the draft Masterplan does not take appropriate account of recent developments in the freight and logistics sector that are likely to have significant ramifications for intermodal activity (and attendant transport implications particularly on regional and local roads). Council is aware of a change in ownership of the MIST terminal at Ingleburn and a projected 'tripling' of associated container movements and a recent approval granted by Council for a new rail siding at Minto, servicing a major industrial zoned site that is at present underdeveloped and used for vehicle storage and distribution. The implications of these 'industry sector movements' for assumptions about freight transfer elsewhere in South West Sydney (e.g. Moorebank) need to be more fully understood, as do the potential impacts on local road networks. These issues must be dealt with appropriately by the draft Masterplan, both in terms of transport planning and investment in critical infrastructure.

The key specific matters that Council has identified as being relevant to the Government's finalisation of the draft Plan relate to the following items:

Proper recognition must be paid in the draft Masterplan of the Campbelltown/Macarthur Business Centre as a major destination for the South Western Sydney regional community (including South West Growth Centre) as a key hub of retail, higher education, regional health and medical, commercial and cultural as well as recreation services. For example, the NSW Government is currently investing substantially in the future expansion of Campbelltown Public Hospital (\$140 million) and a further \$500 million is understood to be allocated in the next two-three years. Further, the University of Western Sydney is intending to increase its own campus student population by 50% from 6000 to 9000 from now up until 2026.

The Campbelltown/Macarthur Regional City Centre is an emerging regional employment hub for the Macarthur Region, with more jobs being created in this centre than many others elsewhere in metropolitan Sydney over recent years The Draft Masterplan fails to appropriately acknowledge the significance of the Campbelltown/Macarthur Regional Centre. The suggestion that better links be established between the Liverpool Health precinct and existing education facilities at the Macarthur/Campbelltown Centre to make Liverpool CBD an attractive place for specialist businesses supporting employment growth and research, cannot be supported.

The Campbelltown/Macarthur Centre is an employment 'destination' in its own right and should be supported by appropriate transport planning and investment. This is seen by Council as a major shortcoming in the current planning assumptions underpinning future transport planning and investment decisions affecting the Macarthur Region.

- The Campbelitown Local Government Area has seven electrified rail stations and one diesel station along the Great Southern Railway Corridor, providing direct public transport access to the Sydney CBD and other key destinations such as Sydney Airport. These stations are accessible to existing and major planned future residential growth areas including:
 - South West Growth Centre (e.g. Oran Park, Turner Road, East Leppington, Menangle Park, Gilead, Campbelltown South); and the
 - Spring Farm Urban Release Area
- The planning for and provision of unobstructed and efficient corridor access to key destinations such as the Campbelltown/Macarthur Regional Centre and the railway stations, from the extensive suburban residential communities across the Macarthur region must be a priority for the Government. This involves the:
 - Construction of new connecting links such as the Spring Farm Parkway;
 - Enhancement and extension of existing links to the South west Growth Centre by increasing the capacity of:
 - Narellan Road, (including widening and intersection capacity upgrades),
 - Badgally Road (through to the Campbelltown Railway station initially and across to Broughton Street direct to the Campbelltown CBD in the longer term) and including intersection upgrades,
 - Raby Road intersection upgrades,
 - Denham Court Road realignment, widening and intersection upgrades, and
 Menangle Road upgrades
- Corridor access to key destinations must be dual mode (bus priority and private vehicle) but delivery in the short term needs to focus on more convenient, reliable, safe, comfortable and efficient public transport connections.
- Railway stations (and especially railway stations that are geographically proximate to new residential release areas) in the Camden and Campbelltown Local Government Areas, must be provided with mode interchange facilities including bus/rail and commuter car parking facilities. To maximise the take-up of public transport in new Greenfield communities, park and ride facilities need to become essential features of new urban release areas that are remote from stations.
- There needs to be consideration granted to an extension of the South West Rail Link through to Narellan in the longer timer

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Substantial effort needs to be directed into the planning and development of transit oriented centre based residential and employment hubs. The Department of Planning's Urban Activation Precincts program appears to be a model with significant potential. Campbelltown City Council is currently considering the promotion of both the Glenfield Business Centre and part of the Campbelltown/Macarthur Regional City Centre as opportunities under this program.

- Unfortunately, no specific mention is made in the draft Masterplan, of the following critical infrastructure needs (with regional significance), to address major regional transport imperatives:
 - Upgrades to commuter parking at any stations within the Campbelltown Local Government Area;
 - Upgrades to interchange facilities and commuter carparking at any stations within the Campbelltown Local Government Area;
 - Priority Bus Network initiatives in the short term;
 - Congestion and pinch point management along key corridors such as Narellan Road, Badgally Road, Raby Road, Denham Court Road, and Menangle Road; and
 - Measures to deal with congestion in and around the Campbelltown/Macarthur Regional City Centre such as grade separation at the intersection of Narellan Road and Blaxland/Gilchrist and the intersection of Narellan Road and Hurley Street
- More integrated solutions need to be developed with the Department of Planning and Infrastructure in so far as addressing 'value capture' from development that take a benefit from government investment in transport. Any discussion must recognise current Government policy to restrain the extent of charges on development, as has been identified for example by the current Green Paper into the review of the NSW Planning System.

In conclusion, Campbelltown City Council would seek to encourage the Government to refine the Long Term Transport Masterplan to demonstrate more clearly the NSW Government's priority commitment to matching planning for housing and employment with planning and investment in key transport infrastructure in the Macarthur Region.

Council looks forward to reviewing the soon to be released revised Metropolitan Strategy, and being able to be satisfied that the significant imposition upon South Western Sydney, and in particular the Macarthur Region, to absorb extraordinary numbers of new houses and jobs (more than any other region in metropolitan Sydney) will be ably serviced by a commensurate investment in critical transport infrastructure. Council would hope that the level of planned investment in transport enhancements in areas where housing and jobs targets are less than those proposed for Macarthur, is exceeded by infrastructure commitments by the Government for our region.

Such an approach would be welcomed by Council and the community, in contrast with historical planning and delivery mechanisms put into place in South Western Sydney.

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Those processes have had the result where the needs of a geographically isolated community have converted into social disadvantage, most obviously in the form of deprived accessibility to employment opportunities as well as accessibility to services and facilities, supplemented by often lower standards of amenity brought about by traffic congestion and a poor public transport 'offer'.

Should you require any further information concerning Council's position on the Draft Masterplan, please do not hesitate to contact Council's Director Planning and Environment Jeff Lawrence on (02) 4645 4575.

Yours sincerely

Paul Tosi

General Manager

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Attachment 4 - Submission to Draft NSW Freights and Ports Strategy 5 March 2013

5 March 2013

NSW Freight and Ports Strategy Team Transport for NSW GPO Box K659 HAYMARKET NSW 1240

Dear Sir

Draft NSW Freight and Ports Strategy

Reference is made to the Draft NSW Freight and Port Strategy and in particular to the invitation to Councils and Industry to raise any concerns to Transport for NSW by 15 March 2013.

I refer to the above issue and workshop attended by this Council on 1 February 2013. This issue was reported to Council's meeting of 26 February 2013 where it was resolved to highlight the following issues regarding the draft strategy.

An outstanding issue is the provision of a high level bridge connecting Cambridge Avenue, Glenfield to Moorebank Avenue, Moorebank. The development of the Moorebank Intermodal is likely to be of a scale that existing passenger traffic is unlikely to be accommodated through the Intermodal Development.

Concerns that were shared with other Councils at the Workshop Forum included:

- Effect of the Sydney Second Airport on existing road and rail network
- Intermodals increasing truck volumes throughout LGA's
- Effects of B Triple's to road infrastructure
- Off peak truck movements, legislative or local government control

The Draft Strategy identifies that a number of projects and developments that will directly impact on the Campbelltown LGA. These include.

- The development of the Moorebank Intermodal, particularly in relation to the impact on the M5 Motorway capacity and the congestion existing on industrial traffic
- The integration of the Macarthur Intermodal Shopping Terminal at Minto into the new freight network.

It is noteworthy that the area adjacent to the new freight line from the southern end of the Liverpool LGA through to Minto is considered by Government to be the largest precinct of the freight related activity in the Sydney basin.

With the growth of Port Kembla to accommodate the movement of containers, several forward projects have been included in the NSW Government submission to Nation Building Program 2. These include:

Improvement to capacity on the F6 and major interchange provision

 Moorebank Intermodal Terminal supporting transport system upgrade. These road infrastructure upgrades are required to meet forecast transport demand driven by the Moorebank Intermodal operations and passenger traffic growth on the surrounding road network.

A further key project that is referred to in a number of sections in the Draft Strategy is the provision of the Malden-Dombarton Rail Line. The Government has provided \$25.5m to undertake planning and preconstruction development. The Draft Strategy suggests that subsequent project delivery and operation of this project will most likely be by the private sector.

It is imperative that the flow of traffic between the Campbelltown and Liverpool LGA's is included in the proposed road infrastructure upgrades for the surrounding road network.

If you require any further information please contact me on 4645 4636.

Yours sincerely

John E Hely Director City Works Attachment 5 - Draft Metro Strategy Submission 8 May 2013

08 May 2013 Mr Sam Haddad Director General Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001

Dear Mr Haddad

SUBMISSION - DRAFT METROPOLITAN STRATEGY FOR SYDNEY TO 2013

Please accept this submission on behalf of Campbelltown City Council relating to the Draft Metropolitan Strategy for Sydney to 2031 (Draft Strategy).

The overall position of Council is that the success of the Draft Strategy to promote sustainable urban growth for the Sydney Region will depend upon Government commitment to the timely delivery of key infrastructure and projects which specifically support job creation, to service future planned urban growth across the whole of the City.

It is acknowledged that the south western areas of Sydney have a key role to play in accommodating a substantial proportion of the overall future urban growth of the City.

This will be achieved through the SW Growth Centre and other urban release areas located in south western Sydney, in addition to the absorption of higher density housing in and around existing urban centres and transport hubs.

In light of these policy intentions, the Government must understand that Council has no alternative other than to express some concern over an absence of detail in the Draft Strategy. This concern is generated as there is no reference to any specific items for future Government investment in strategic infrastructure projects or employment creation initiatives that would address the needs of existing and future SW Sydney communities.

These issues are amplified as the draft Strategy includes similarly needed infrastructure and support for more established parts of the Sydney Metropolitan Area.

Without Government commitment to the proper infrastructure provision for the targeted growth areas of the SW region, it is likely that the relative inequities and disadvantage that are already experienced by residents in the Macarthur area, including Campbelltown, will not be significantly altered.

Additionally, the opportunities for Campbelltown to strengthen its role and function as the principal urban centre for the Macarthur Region will be compromised to the disadvantage of our growing community.

The specific issues and concerns held by Council on the Draft Strategy are provided under the respective headings below.

Planning Imbalance

The Draft Strategy is considered to be imbalanced with respect to concentrating business investment, job creation and infrastructure provision within the more central and established urban areas of Sydney, whilst setting key housing and employment growth targets in western Sydney particularly for the Macarthur Area.

Seven of the nine 'city shapers' depicted by the Draft Strategy are focused on more established areas within the city, and there is no recognition of the South West Growth Centre as a city shaper, notwithstanding that it will provide a major metropolitan scaled housing growth precinct for Sydney for many years to come. For example, light rail infrastructure is planned for the already highly serviced areas of eastern Sydney, however, there is no definite commitment to railway infrastructure for the South West Growth Centre beyond Leppington, neither is there any commitment to the future provision of rail infrastructure in conjunction with the delivery of the M9 or that connecting Camden to the Sydney passenger rail network.

Further, the emergence of the south west as an important freight, logistics and distribution hub for the metropolitan area has not been recognised as a major driver of economic growth, which will require special attention by Government with regard to infrastructure investment.

It is the position of Council that dealing properly with this 'city shaping' opportunity now, would help avoid potential negative environmental and congestion impacts in the longer term. It would also add value to the potential for this 'hub' to generate even more jobs to help address the employment challenges facing the south west.

On the matter of employment, Council notes that 15 'specialised precincts' have been identified for the promotion of growth and investment opportunities in places that 'play an economic and employment role of metropolitan significance in Sydney, sometimes associated with a hospital or university or an important business park or office cluster'.

Despite Council's nomination of two Urban Activation Precincts in support of the government's mandate to create for employment lands, Council notes with concern there are no specialised precincts identified for south west Sydney despite Campbelltown/Macarthur clearly satisfying the eligibility criteria under the Draft Strategy for specialised precincts. These include the 'colocation' of the recently established UWS Medical School; Campbelltown Public Hospital (currently undergoing a \$140 million upgrade with a further \$500 million upgrade to be commenced in the near future), two railway stations, access to the M5, as well as strong retail facilities. Other precincts with less significant infrastructure and investment already in place, appear to have been recognised as being worthy of Government recognition as a 'specialised precinct'.

Campbelltown/Macarthur can therefore no longer be considered as or used as a dormitory for workers. The Metropolitan Strategy needs to acknowledge the importance of the Campbelltown/Macarthur area as the south west gateway to the greater city of Sydney, and provide immediate actions to generate sustainable employment opportunities for the people of Campbelltown/Macarthur and surrounding areas

Council seeks clarification as to why the opportunity to list Campbelltown/Macarthur as a nominated 'specialised precinct' has not been taken.

Proposed Boundaries of Southwest Subregion

The relevance of the six Local Government Areas grouped within the proposed revised south west Sydney Subregion should be re-examined. The nominated boundaries of the south west Subregion, which has been amended to include Bankstown and Fairfield, does not reflect the stronger links and interdependence of Campbelltown and the Macarthur more generally, with the Southern Highlands and the Illawarra.

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It is suggested that Campbelltown has stronger economic and 'service' ties with the regional communities of the Southern Highlands and to a lesser extent the northern Illawarra, than it has with Bankstown and Fairfield. This includes direct road and rail network connections, workforce participation, and freight movements from Port Kembla.

In many ways, Campbelltown serves as the regional gateway to the Sydney Metropolitan area for these outer areas, which has been overlooked in the Draft Strategy.

Given the role of Campbelltown as a metropolitan link with these outer areas, the Draft Strategy should consider the promotion of Campbelltown to regional status and reconsider the strategic relationship with the areas nominated more so than with Bankstown or Fairfield.

Regional Status of Campbelltown/Macarthur Centre

Accordingly, the Draft Strategy undervalues the urban status of the Campbelltown/Macarthur Centre as the dominant urban precinct of the South West Region, which must be re-examined.

Campbelltown/Macarthur should be considered as a regional city centre given existing and potential opportunities to provide regionally significant medical, retail, and education services. Its dominant service role and metropolitan transport connections for the surrounding region are already in place and undeniable. The City is strategically placed to serve the key urban growth areas planned for the south west, and provides an important metropolitan link to the peripheral urban areas of the Southern Highlands and Wollongong.

Campbelltown/Macarthur satisfies the relevant criteria under the Draft Strategy for regional city status, and in certain instances exceeds the criteria compared to other major metropolitan centres. For example, Campbelltown/Macarthur has the highest jobs growth target of any major centre in the Draft Strategy, comprising a minimum jobs growth target of 10,000 jobs. This figure exceeds the targets for the nominated Regional Cities of Liverpool (9000) and Penrith (8000).

Whilst Campbelltown is clearly identified as a 'major centre' under the Draft Strategy there is little recognition of the potential of Campbelltown/Macarthur to continue to naturally emerge as a regional city in its own right. This is in contrast to Metro 2036 which identified Campbelltown (and Blacktown) as having the greatest potential to achieve this regional level status.

Lack of Detail and Certainty for South West Sydney

Council believes the Draft Strategy generally inappropriately restricts the detailed and significant commitment of Government investment into infrastructure and employment generation projects to those located within the 'Global Economic Arc', and other nominated specialised precincts none which are located within the Macarthur region or Campbelltown Local Government Area.

Whilst there are clear targets for housing delivery and employment growth for South West Sydney, there are no clear commitments to match the strategic funding and delivery of infrastructure and investment through key projects to sustainably achieve these targets. This information is deferred to a range of future Plans and Policies to deliver the intended outcomes.

Council believes that this approach may disadvantage the future prosperity and well-being of the community of south western Sydney, in the allocation of scarce public resources for investment into 'enabling infrastructure' and job creation.

Importantly, the Draft Strategy needs to provide a stronger commitment to support economic drivers so as to ensure that the market actually achieves the forecast housing and employment targets. In this respect, the Draft Strategy should include clear infrastructure and investment commitments, similar to that outlined for the 'Global Economic Arc'. This would add certainty and confidence in the urban growth outcomes for South Western Sydney being achieved in a sustainable manner in the best interest of our community.

Centres Hierarchy

The strategy should take into consideration that the planned hierarchy of metropolitan centres to serve the South West Growth area, may be compromised by market driven outcomes.

If the Draft Strategy does not provide clear rationale to steer private sector investment into centres in accordance with the strategic hierarchy, then the provision of subregional services by the planned major centres may be compromised through market uncertainty.

The Draft Strategy should provide a very clear rationale to manage the status of town centres so as to create greater certainty for private sector investment to grow the planned hierarchy of major centres and sustain confidence over the future provision of infrastructure to serve this planned hierarchy.

In the overall planning context relating to the hierarchy of centres, Council considers that there is good reason to review the status of Ingleburn Town Centre given the strategic location of the centre and significant capacity for growth. Taking into account the major public investment proposed for Ingleburn Railway Station and carparking Council considers that Ingleburn has potential to achieve major centre status.

White Paper Implications

Under the current planning system, the Metro 2036 is only given statutory recognition by a 'S117 Ministerial Direction' which requires 'planning proposals to implement the vision, transport and land use strategy, policies, outcomes and actions of the Metropolitan Plan for Sydney 2036'. In this respect, the role of the current Metropolitan Plan is generally limited to the preparation of new planning proposals and policies, and does not prevail over current statutory planning controls.

However as the proposed NSW Planning reforms eventuate, the new Draft Strategy will be likely to have a more significant role in influencing development outcomes for Sydney. Under the proposed reforms, the Draft Strategy would have formal recognition as a Metropolitan Growth Plan and would potentially allow for 'conforming development' to be approved in certain instances. In this respect, the role of the Draft Strategy would extend beyond policy control into the realms of development assessment and approval.

Consequently, it is considered that there may be some risk that the strengthened role of the Draft Strategy under the proposed planning reforms may provide for development outcomes which may not adequately consider local planning circumstances. This issue requires close examination and consultation with Council.

Transport Infrastructure

Compared with Metro 2036, there are considered to be minimal amendments made to the Draft Strategy that would improve sustainable growth outcomes for the significant planned expansion of SW Sydney. Furthermore, the Draft Strategy's reliance upon the NSW Long Term Transport Master Plan to address transport planning outcomes does little to address the range of concerns previously raised with the NSW Government by Council on this matter.

The Draft Strategy makes no or minimal mention of a number of proposed strategic road and transport infrastructure to service Campbelltown or the Macarthur region more widely. This includes:

- Spring Farm Arterial
- Badgally Road

Railway overpass connecting Badgally Road and Broughton Street

Campbelltown Bus/Rail Interchange

Cambridge Ave link to M5

· Denham Court Road upgrade.

No mention is made of a second Sydney Airport in any specific respect.

Notwithstanding, the Draft Strategy does recognise the need to protect the Georges River Parkway Corridor, which possibly indicates an intention not to abandon the Macarthur South Urban Land Release in the longer term. Council would appreciate clarification over that matter as soon as possible.

Commitment by the NSW Government to the timely provision of transport infrastructure to serve the planned population growth for the South West Region is considered critical to ensure that a sustainable land use outcome can be achieved. This includes continued access for residents to housing and services, in addition to encouraging investment and the creation of locally accessible employment opportunities. Without this commitment, residents of Campbelltown and the Macarthur region will be at risk of suffering further social and economic inequity with excessive travel times and associated reduction in lifestyle quality.

This is a different outcome that is likely to be experienced in some other parts of Sydney, particularly areas located closer to the Sydney CBD, should the Draft Metro Strategy be adopted in its current (exhibited) form.

Metropolitan Rural Areas

The inclusion and acknowledgement of the Metropolitan Rural Areas in the Draft Strategy is commended in terms of ensuring a strategic balance is provided between the urban growth and rural areas. However, it is considered that the Draft Strategy should provide more specific and measurable targets to ensure the proper management and conservation of these rural areas is achieved. This may include targets such as environmental or land holding criteria. In this respect, issues are raised that the Draft Strategy may not sufficiently curtail ad-hoc and market driven development of the nominated rural areas, for urban growth. This includes the possible facilitation of owner nominated sites for advancement of urban subdivisions in existing non-urban areas ahead of strategically planned urban growth areas and related programmed infrastructure provision. Council looks forward to receiving further detail on this matter following the preparation of the Government's proposed new urban land release policy.

As such, it is considered that the Draft Strategy should provide greater certainty in properly balancing the potential for land use conflict occurring from new urban development in existing rural areas. This would include for example, impacts on biodiversity, water catchment management, agricultural sustainability and resource acquisition.

M9 Route

It is understood that the alignment of the M9 corridor for the Outer Sydney Orbital is very preliminary. However, as a Strategic Plan for future growth within the metropolitan area, it is considered that this corridor should be identified and reserved as early as possible to ensure local planning decisions do not compromise the alignment. It also is considered essential that the M9 corridor be designed of sufficient width to adequately cater for a rail corridor, so as to provide a range of public transport opportunities in the future. This would include a greater level of detail on the intended north and south connections.

Additionally, consideration should be given to the land use implications of providing a vital piece of road infrastructure through rural areas, particularly given the likelihood of urban growth being encouraged along this corridor. For this reason, consideration should be given to the M9 being aligned to better integrate with and potentially service the population and employment growth areas of western Sydney.

Conclusion

Having regard to the above issues and concerns, Council requests that the Department adjust the Draft Strategy to address the apparent inequity between the key housing and employment growth targets for western Sydney, and the focus on infrastructure and investment commitments towards the 'Global Economic Arc' and other more established urban areas of Sydney.

Accordingly, Council is concerned that the significant urban growth areas targeted for the south west region will not be sustainably managed and serviced with the required infrastructure.

Overall, Council seeks the reassurance of the Department and the NSW Government, that the Metropolitan Strategy will be adjusted to achieve a much reduced jobs deficit for south western Sydney. Clearly, the proposed urban growth is not targeted to be served by an appropriate investment in new job creation. This is perhaps the most significant issue of concern, given its importance in assisting with the achievement of an improved quality of life for our community. I look forward to your feedback on the Draft Strategy and wish to emphasise Council's commitment to continuing to work with the Department to progress and finalise this important Policy. Accordingly, Council would appreciate the opportunity to meet with representatives of the Department to speak further on the Draft Strategy.

If you require any further information, please contact me on 4645 4659.

Yours sincerely

Paul Tosi General Manager