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Project: Moorebank Intermodal Terminal – SIMTA Proposal Review of 2012 and 2013 Public Exhibition Submissions

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1. Introduction

1.1 Background

In 2005, the Freight Infrastructure Advisory Board highlighted the need for the development of an intermodal terminal at Moorebank, to achieve an increase in the rail mode share of port container freight movements.

In April 2012, the Australian Government committed to the development of the Moorebank Intermodal Terminal Project (ITP). The ITP involves the development of freight terminal facilities linking Port Botany and the interstate freight rail routes. The key aim of the Terminal would be to reduce road freight on Sydney's road network by facilitating a move to rail freight.

Two separate proposals have been prepared to date located on sites abutting Moorebank Avenue known as the SIMTA proposal and the MIT proposal. The two site locations are indicated within Figure 1 for information.



Figure 1 SIMTA and MIT Proposal Sites

A summary of the components of the latest proposals for each site is set out within Table 1.

Table 1 SIMTA and MIT Intermodal Pr	oposals	
	SIMTA	МІТ
	Proposal Features	Proposal Features
Total Site Area	83 hectares	220 hectares
Intermodal Terminal Capacity	1M TEUs per annum	1.2M TEUs per annum
(imports and exports)		
Interstate Terminal	None	302,000TEUs per annum
Empty Container Storage	??	??
Warehouse and Distribution Facilities	300,000sq.m	97,400sq.m
Freight Village	8000sq.m	
Employees	2260 on site at full development	664 associated with terminal plus warehousing staff
Rail Link	New connecting with the Southern Sydney Freight Line	New connection to the Main South Railway Line and SSFL

1.2 Scope of Services and Report

Aurecon has been commissioned by Planning & Infrastructure to undertake a peer review of the SIMTA transport planning assessment process.

Based on the scope of works in the request for quote, the following activities have been undertaken in relation to the traffic and transport matters during the course of this peer review:

- Attend inception meeting with Planning & Infrastructure;
- Collation of traffic and transport documents/submission in relation to the proposed • development;
- Review all traffic and transport documents/submissions in relation to the proposed terminal • facilities;
- Analyse the information included in the traffic and transport documents/submissions based on the NSW government and local government guidelines;
- Assess the access arrangements, traffic/transport impacts and safety implications; •
- Comment on the recommendations to mitigate the identified impacts;
- Prepare feedback reports for the associated terminal facilities at progressive intervals; and
- Review the proponents response to Aurecon's peer review and other submissions.

SIMTA Review Points

- SIMTA 1A: Public Exhibition First Project Documents Available • Part 3A Concept Plan Application - Traffic and Transport (Appendix K of EIS), dated August 2011
- SIMTA 2A: Public Exhibition Second Project Documents Available Part 3A Concept Plan Application - Traffic and Transport (Appendix F of EIS), dated August 2013
- SIMTA 1B: Review of First Project Submissions up to February 2014

- SIMTA 2B: Review of Second Project Submissions up to February 2014
- SIMTA 1C:Feedback on First Project PPR / RtS documentations up to February 2014
- Feedback on Second Project PPR / RtS documentations up to February 2014

Report Purpose and Structure

This report provides a review of the submissions that have been received for both the 2012 and 2013 public exhibition periods.

2. Public Exhibitions and Receipt of Submissions

2012 Public Exhibition Period

The SIMTA proposal was first exhibited to the public between 28 March and 28 May 2012, however Aurecon are advised that at this time the appropriate property ownership consent or notification process was not completed in accordance with the relevant legislation.

Whilst not meeting the legislative requirements the 2012 public exhibition period did result in submissions from both private parties and government agencies.

2012 Submissions

A total of 33 submissions were received in response to the 2012 exhibition process, of these 13 were from Government Agencies and 20 from private parties in relation to traffic and transportation issues. The Government Agencies that provided submissions are listed below with those set out in grey not including transport associated matters:

- Liverpool City Council (included a Peer Review by Cardno)
- Campbelltown City Council
- Bankstown City Council
- NSW Department of Primary Industries
- NSW Department of Primary Industries Office of Water
- Australian Government Department of Defence
- Australian Government Department of Finance and Deregulation
- Australian Rail Track Corporation Ltd
- NSW Environment Protection Authority No transport matters raised
- Heritage Council of New South Wales No transport matters raised
- NSW Office of Environment & Heritage No transport matters raised
- NSW Health Population Health No transport matters raised
- NSW Transport for NSW

The submissions received for the 2012 exhibited proposal have been reviewed and those relating to transport matters have been summarised below:

- Traffic Generation
- Traffic Distribution
- Traffic Modelling
- Extent of Assessment
- Traffic Impacts (including local impacts, regional impacts and cumulative impacts)
- Road Network Capacity

2013 Public Exhibition Period

Aurecon have been advised that the proponents have now completed all the legislative requirements in order to technically put the proposal out to public exhibition.

The second exhibition period occurred between 4 September and 21 October 2013 with both the public and government agencies to register submissions.

2013 Submissions

A total of 31 submissions have been received in response to the 2013 exhibition period these have included 5 from government agencies and 26 from other parties. The government agencies that provided submissions are:

- Department of Defence / Department of Finance and Deregulation
- Bankstown City Council
- GWS
- EPA
- Liverpool City Council
- Transport for NSW

The submissions in response to the 2013 exhibition period have been reviewed and are summarised within Table 1-2. In addition these have also been compared to those received for the 2012 exhibition and Table 1-2 notes where these are basically the same submission or issues.

3. Review of Submissions

The transport related issues identified within each submission have been reviewed under the following headings.

- Traffic Generation
- Extent of Assessment
- Traffic Impacts (including local impacts, regional impacts and cumulative impacts)
- Road Network Capacity

It should be noted that the 2013 submission provided by Transport for NSW states that it *"reiterates the response to the exhibited concept plan that was publically exhibited between 28 March and 28 May 2012"*. This review of submissions therefore assumes those issues and concerns raised by Transport for NSW in 2012 are also raised against the 2013 documents.

3.1 Traffic Generation

The traffic generation adopted within both the 2012 and 2013 public exhibition documents was generally the same. Concerns in relation to the assessment of traffic generated by the SIMTA proposal were raised by 2 government agencies and 2 citizens.

Transport Matter Raised	Submission	Gov	vernm	nent /	Agen	cies					imes Raised in Submissions
	Exhibition St	CC	CCC	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	TfNSW	Total Times Public Subm
Trip generation assumptions were broad and lack of research and assessment. Traffic generation of truck movement was under	2012										1

2013

Aurecon Response

estimated.

The traffic generation and hence total traffic generation for the SIMTA proposal has not changed between the 2011 assessment and the current 2013 report which indicates that the SIMTA proposal would generate approximately 6250 vehicle movements per day on an average weekday (2638 trucks and 3613 cars).

This estimated traffic generated from the SIMTA proposal seems too low for an intermodal terminal with capacity of 1 million containers per annum. It is noted that Aurecon also has raised concerns on traffic generation, particularly in relation to the assumption that 30% of trucks that would departing with a container would have delivered a container.

It is recommended that:

- Further justification as to the final traffic generation figures is provided;
- Consultation is undertaken with the Transport for New South Wales to agree appropriate traffic generation level; and/ or
- Case study data from similar intermodal terms is undertaken.

3.2 Traffic Distribution

Transport Matter Raised	Submission	Gov	/ernn	nent /	Agen	cies					Raised in nissions
	Exhibition S	rcc	200	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
Due to the adversely delays and congestion at M5 Motorway and Moorebank Avenue,	2012										1
Cambridge Avenue could be the alternative access route. Cambridge Avenue was not included in the assessment.	2013										

Aurecon Response

There is no supporting evidence or justifications as to why the assessed traffic distribution has been adopted. Without this information it is difficult without undertaking separate analysis to comment as to

whether Cambridge Avenue could be a viable alternative and therefore should be included within the assessment.

It is recommended that either:

- Additional supporting evidence in relation to the adopted distribution is provided which will also justify why Cambridge Avenue will not be materially impacted by the development; and / or
- An analysis of Cambridge Avenue is undertaken.

3.3 Modelling

Traffic models were developed to assess the impacts of traffic generated by SIMTA proposal on the different levels of area. Paramics microsimulation models were developed for core area and inner area, while strategic model were developed wider area covering Sydney metropolitan area.

Transport Matter Raised		Gov	Government Agencies								
	Exhibition Submission	rcc	CCC	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subm
The infrastructure upgrades were not considered in the traffic model	2012										
	2013										

Issue 1: Traffic model for infrastructure upgrade

Aurecon Response

A total of 5 locations within the core area were identified where infrastructure upgrade is required in 2011 traffic report. These upgrades concentrated on Moorebank Avenue and intersecting on- and offramps with M5 Motorway. The submission from Transport for NSW recommended that these infrastructure upgrades should be tested in the traffic models and their traffic performance reported.

Hyder 2013 traffic report also reported these identified infrastructure upgrades were considered in the Paramics model. The intersection performance for both AM and PM peak for the improved case network in 2031 was summarised in the report.

Issue 2: Traffic modelling issues

Transport Matter Raised	Submission	Gov	/ernn	nent /	Agen	cies				Raised in nissions	
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times F Public Submi
Inappropriate modelling issues, such as release blockage and inadequate	2012										1
documented assumptions	2013										

Aurecon Response

Whilst this was raised in one private submission it is noted that no government agencies identified that there were significant modelling assumptions where not supported or that there was insufficient modelling documentation.

In addition it is noted that both Halcrow Paramics traffic model audit and Aurecon peer review did not raise this as the modelling assumptions were reasonable and documented. The release blockage was within acceptable range.

3.4 Extent of Assessment

Traffic assessment was undertaken in three levels of scopes, "core" area, "inner" area and "wider" area. However a number of submissions raised issues relating to specific locations, intersections and areas where it was considered that the level of assessment was insufficient or no assessment was undertaken.

Issue 1: Moorebank Avenue / Bapaume Road

Transport Matter Raised		Government Agencies					Raised in nissions				
	Exhibition Submission	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times R Public Submis
Moorebank Avenue and Bapaume Road intersection was not included assessment.	2012										
	2013										

Aurecon Response

Bapaume Road is a local street that is located approximately 115 metres north of the Anzac Road intersection. Bapaume Road intersection is unsignalised with no local widening and Bapaume Road is an access road only providing links to a number of existing properties to the west of Moorebank Avenue, the road does not link through to the remainder of the road network.

The SIMTA development may impact the operation of this intersection in a number of ways:

- Some increase in delays to traffic trying to exit the existing uses off Bapaume Road
- Potential for queuing back from Anzac Road might occur due to the congested Moorebank Avenue

However, it is considered that impacts, particularly given the proposed upgrade works on Moorebank Avenue are unlikely to have a material impact on the overall operation of this local access road, given its context in the road network.

Issue 2: Other Streets at Moorebank Avenue

Transport Matter Raised		Government Agencies							Raised in nissions		
	Exhibition Submission	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times I Public Subm
A number of critical street just outside of core area were not included in the	2012										2
assessment, such as Governor Macquarie Dr., Nuwarra Road, Hume Hwy.	2013										1

Aurecon Response

Governer Macquarie Drive

Governor Macquarie Drive links Newbridge Road, approximately 3km east of the northern end of Moorebank Avenue, to Hume Highway approximately 4.5km from the M5/ Hume Highway intersection. It is considered that it is unlikely to be an attractive route for significant traffic accessing the SIMTA site.

Nuwarra Road

Nuwarra Road is located to the north east of the site and potentially could provide an alternative link through to the site via Anzac Road. The adopted employee trip distribution indicates that 5% of employee traffic and zero trucks would use Anzac Road, this would equate to approximately 180 car movements per day. It is assumed that these trips would be primarily split between Nuwarra Road and Wattle Grove Drive, which provide links to residential areas to the north and south of M5 Motorway respectively.

It is also noted that the employee distribution assumed a further 43% of employee trips would be to and from the north and east although not by Anzac Parade. If congestion is severe on M5 Motorway and / or Moorebank Avenue north of the motorway Nuwarra Road could become and alternative route for some of this employee traffic to access the site.

Current traffic volumes on Nuwarra Road are not provided however it is noted that section 6.11.1 of the Hyder report includes additional assessment outside the core area and this includes the impact of the SIMTA development at the following intersections:

- Newbridge Road / Nuwarra Road
- Heathcote Road/Nuwarra Road

It is noted that based on the adopted traffic distribution SIMTA traffic would represent less than 1% of traffic through each of these intersections.

Hume Highway

From the information provided within the Hyder report it is understood that Hume Highway catered for approximately 50,500 vehicle movements per day. Given that the SIMTA site would generate less than 7000 vehicle movements per day in total and that this would be distributed primarily on Hume Highway north and south and M5 Motorway, it is unlikely that traffic volumes on Hume Highway other than at the M5 motorway would be significantly above daily traffic variations.

It is also noted that Section 6.11.1 of the Hyder report includes the results of additional analysis at:

- Hume Highway / Camden Valley Way
- Hume Highway / Kurajong Road
- Hume Highway / De Meyrick Avenue
- Hume Highway / Hoxton Park Road / Macquarie Street

SIMTA traffic is understood to represent less than 3% of the total traffic through each of these intersections and therefore is likely to be well within daily variations.

Issue	2:	Infrastructure	upgrade
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Transport Matter Raised	Submission	Gov	/ernn	nent /	Agen	cies					Raised in nissions
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
A number of road and intersections currently experienced significant delays and											
congestion, with or without SIMTA traffic. However most of them were not included in the future upgrade assessment	2013	-									

Aurecon Response

The Hyder report indicates that the existing road network surrounding the site exhibits a range of performance with LoS's noted from A through to F.

It is recommended that consultation should be undertaken with LCC and BCC (who raised this issue within as a response to 2013 public exhibition) to identify which intersections were the subject of the concern.

3.5 Traffic Impacts

Local impact (direct adjacent local streets, Wattle Grove Dr. and Anzac Rd)

The issue was raised by Department of Defence, which concerns the impacts of SIMTA proposal on a few projects proposed next to the SIMTA site in the future.

Issue 1: Impacts on Department of Defence proposals

Transport Matter Raised	Submission	Government Agencies									Raised in nissions
	Exhibition Su	LCC	CCC	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times F Public Submi
SIMTA proposed to share the northern access with Defence National Storage and Distribution Centre.	2012										
The traffic impacts of the SIMTA proposal during construction and operational stages on the School of Military Engineering and Defence Logistics Transformation Project were not assessed.	2013										

Aurecon Response

In responding to the government agencies' submissions, the impact on the DNSDC relocation site was assessed in 2013 traffic report, rather than 2011 traffic report.

A new signalised intersection was proposed on Moorebank Avenue approximately 300 metres south of Anzac Road to provide the access to DNSDC site and the SIMTA northern access. It was reported that this new signalised intersection would operate in LoS A or B in 2031 with infrastructure upgrade on Moorebank Avenue.

In terms of access during construction it is considered that it would be more appropriate for this to be considered at later stages of the planning process as part of a construction traffic management plan.

Issue 2: Impacts on local streets

Transport Matter Raised	ubmission	Government Agencies									Raised in nissions
	Exhibition Submission	LCC	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
Concerns of heavy vehicles, truck, semi- trailers, B-Doubles would travel along	2012			-							2
surrounding local streets as a short cut or rat run route. This could result in safety and environmental issues	2013										8

Aurecon Response

On a constrained network there is the risk of heavy vehicles and other traffic using local roads to bypass known areas of congestion.

It is considered that at this stage the assessment it is appropriate to recognise that this could occur however it is difficult to assess accurately. It is recommended that this concern could be mitigated by a condition for regular monitoring of local streets and triggers for implementation of local area traffic management to address any issues that may occur in the future.

Regional impact (inner area)

Issue 1: Concerns on future rail line

The impact on the proposal on the operation of rail movements has been raised by a number of government agencies, particularly in response to the 2012 public exhibition documents, however in light of the 2013 exhibition this only appears to remain a concern for BCC.

It is noted that this is not a concern for submissions from the private parties.

Transport Matter Raised	Submission	Government Agencies									Raised in nissions
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
Impacts of the SIMTA proposal on the future expansion of the East Hills passenger rail line were not assessed.	2012										
The likely destination of freight containers need to be specified in order to ascertain the impact in Councils assets and residents.	2013										

Aurecon Response

BCC have raised the issue that the proposal may impact the future expansion of the East Hills passenger line however it is noted that this has not been raised as a concern by the relevant rail and state transport authorities.

It is further noted that the documentation provided for the 2013 public exhibition indicates that the following actions have been undertaken in relation to the potential on the East Hills Passenger Rail:

• Stakeholder consultation was undertaken with both RailCorp and TfNSW in relation to matters such as potential quadruplication of the East Hills Line

It is also noted that the Rail Access report indicates that the design of the proposed rail spur to the SIMTA site has been considered and states:

• "land allowance for possible quadruplication of Railcorps existing East Hills Railway line. In undertaking this assessment we have allowed for the new rail line servicing the SIMTA site to be placed in land directly north of the East Hills line and provided concept sketches to satisfy that the quadruplication can be catered for to the south of the current East Hills line.

Given this above it is suggested that the current documentation provided is satisfactory for this stage of the development application process



Transport Matter Raised	Submission	Government Agencies									Raised in nissions
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times F Public Submi
Traffic impact assessment on inner area was insufficient	2012			-						•	2
	2013										2

Aurecon Response

The extent of the traffic impact assessment for the 2012 public exhibition was considered insufficient by both RMS and BCC as well as identified as an issue within two submissions from private parties. It is noted that within the 2013 public exhibition documents this had been addressed to the satisfaction of all government agencies as the analysis had been expanded to include:

- Hume Highway / Camden Valley Way
- Hume Highway / Kurrajong Road
- Hume Highway / Hoxton Park Road / Macquarie Street
- Terminus Street / Speed Street
- Newbridge Road / Nuwarra Road
- Heathcote Road / Nuwarra Road
- M5 Motorway / Heathcote Road

This additional analysis is considered to be appropriate. Whilst it is recognised that local residents may still have some concerns it is considered that monitoring of local streets may be more appropriate when the development is complete rather than attempting to assess the impact at this stage.

Issue 2: Safety issues

The issue of safety on local streets and in relation to weaving on the M5 Motorway was raised within 6 private submissions in response to the 2012 exhibition documents and 2 submissions in response to the 2013 exhibition documents.





		CC	222	BCC	DoPI	ΔοΡΙ-Οο	DofD	DofF&D	ARTC	Transport	
Safety concern were raised on local streets and M5 Motorway weaving issues, due to	2012										6
significantly increased truck traffic	2013										2

Aurecon Response

The above table indicates that public has more concerns on safety than the government agencies, none of which raised this as an issue with the proposal.

It is noted that the exhibition documents assumed that no truck traffic would travel along Anzac Road due to its function as a local street, however, submissions from local residents suggest that currently heavy vehicle traffic from surrounding uses may use Anzac Road to bypass congestion on M5 Motorway during peak periods. The private submission has therefore raised concern that SIMTA truck traffic could also adopt this alternate route.

It is recommended that at later stages of the development process mechanisms could be implemented to provide monitoring and triggers developed to introduce local area traffic management measures to limit the use of Anzac Road by heavy vehicles, if the operators of the SIMTA facility are unable to restrict heavy vehicle traffic movements to appropriate roads.

Cumulative impacts with Commonwealth IMT proposal

The extent of the assessment of the cumulative impact of the multiple intermodal proposals for the Moorebank area have been raised by a number of government agencies and within private submissions in response to both the 2012 and 2013 public exhibition documents.

Transport Matter Raised	Submission	Government Agencies								Raised in nissions	
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subr
The SIMTA traffic assessment did not considered the Commonwealth MIT project.	2012										1
	2013										4

Aurecon Response

Aurecon understand that when originally proposed there was the possibility that both the SIMTA and MIT proposals could proceed to their full capacity.



Aurecon understand that due to the capacity of Port Botany there is a limited catchment that would not support the full development of both proposals. Therefore it is understood that at this stage the following options could occur:

- > Only SIMTA proposal
- > Only MIT proposal
- > Reduced scale MIT & reduced scale SIMTA

Section 6.9 of the 2013 exhibition documents this and states:

"Any future proposal by the Moorebank Intermodal Company Limited (MICL), formerly known as the Moorebank Project Office (MPO) is expected to service the similar catchment area reducing the ability for the SIMTA to achieve full operational capacity."

However it is noted that the MIT (or MICL proposal) includes an interstate facility. It is assumed that the throughput of this facility is not impacted by the Port Botany catchment and potentially could add to the cumulative impact. It is noted that the MIT draft EIS indicates that the interstate facility would generate 410 truck movements per day in 2030.

Given the above the issues in relation to the extent of analysis of the cumulative impact of the developments that were raised by LCC, BCC, DoD, DoFD and within 4 private submissions in response to the 2013 exhibition documents are not unreasonable and this additional analysis should be undertaken.

Impacts on public transport

Access to and from the site by public transport, and in particular buses, was raised by Transport for the 2012 exhibition documents but not in response to the 2013 documents.

Transport Matter Raised	Submission	Gov	/ernn	nent /	Agen	cies					Raised in nissions
	Exhibition S	rcc	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
The evaluation of short term and long term bus service arrangement was not	2012										2
undertaken in the assessment	2013										1

Aurecon Response

It is noted that although the lack of an assessment of short term and long term bus service arrangements was raised as an issue after the 2012 exhibition but not after the 2013 exhibition the level of analysis within both traffic reports was the same and stated that:

- 9 or 10 buses would be required to link Liverpool Station to the site in the morning 2 hour peak; and
- 3 to 4 buses would be required to run between the site and Holsworthy Station

This is supported by a Public Transport Assessment prepared by Urbanhorizon Pt Ltd and included for both documents, which includes timelines for implementation of different sustainable transport measures.

It is considered that this provides sufficient evaluation for this stage of the development process. It is noted that all the analysis assumes that full public transport access strategy is implemented by the time the site is fully operational.

3.6 Road network capacity (mainly the road and intersection congestion concerns)

The issue was raised in all submissions concerning the road capacity adjacent to the SIMTA site due to the significantly increased employment and truck traffic generated by the proposal.

Transport Matter Raised	ubmission	Government Agencies									Raised in nissions
Transport Matter Kaiseu	Exhibition Submission	LCC	222	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Ra Public Submis
Moorebank Avenue is the direct access street to both SIMTA site and Commonwealth MIT project.	2012										7
Concern was raised that the existing congested intersections along Moorebank Avenue, M5 Motorway, Hume Highway and Newbridge Road will operate over capacity due to significantly increased traffic.	2013										18

The base model results indicated that a number of intersections were currently operating near or over capacity as a Level of Service E or F. These intersections include:

- Moorebank Avenue / Heathcote Road,
- Hume Highway / Hoxton Park Road / Macquarie Street
- Newbridge Road / Nuwarra Road
- M5 Motorway / Heathcote Road

Ten out of thirteen assessed intersections would operate over capacity in 2031 without SIMTA proposal in a range of delays between 71 seconds and 373 seconds. The road network would become worse with the SIMTA traffic, as reported in the traffic impact assessment report.

Although the infrastructure upgrades within the core area were identified and assessed with Paramics model, mitigation measures did not provided/suggested for the identified congestion locations outside core area.

It is recommended that consultation should be undertaken with Transport for New South Wales to identify the infrastructure improvement to increase road network capacity in the inner area. It is noted that the 2013 Transport submission suggests that the minimum infrastructure upgrades that should be committed to by the combined SIMTA/MIT developments would include:

- Upgrade Moorebank Avenue to a four lane road from the most southerly point of access up to and including the intersection of Moorebank Avenue and the M5
- Upgrade to the Moorebank Avenue, Newbridge Road and Heathcote Road intersection

In addition Transport indicate that the submission requires more clarification in relation to how the rail alignment will be accommodated and means to integrate the same rail connection into both the SIMTA and MIT sites.

3.7 Timeframe of infrastructure upgrade and SIMTA operation

This issue was mainly raised by Campbelltown City Council in relation to the timeframe of essential infrastructure upgrade and intermodal terminal operation

Transport Matter Raised	Submission	Gov	vernm	nent /	Agen	cies					Raised in nissions
	Exhibition S	rcc	200	BCC	DoPI	DoPI-OoW	DofD	DofF&D	ARTC	Transport	Total Times Public Subn
The timeframe should be assured that all essential on- and off- site infrastructure upgrade needs to be constructed and	2012										
provided prior to commencement of any operation at the SIMTA site.	2013										

Aurecon Response

The proposed access route to SIMTA site via M5 Motorway is expected to exceed its capacity as early as 2016, and capacity will also be exceeded at key intersections that provide access to the precinct, which was identified in the Long Term Transport Master Plan (2012).

It is apparent that lack of the support of the essential infrastructure upgrades, such as rail link to/from the Southern Sydney Freight Line, upgrades of Moorebank Avenue and relevant intersections, the traffic generated by the SIMTA site will inevitably be expected to have adverse impacts on the surrounding road network. It will significantly become worse if rail access cannot be provided when the SIMTA is operational.

It is considered that the construction of necessary infrastructure facilities is essential and must be gazetted prior to commencement of operation of the SIMTA proposal to assure the operation efficiency for both SIMTA site and road network. Consultation of the proposal timeframe should be consulted with TfNSW and Council.

4. Conclusions

Based on the above review of the submissions provided for the 2012 and 2013 public exhibition documents it is considered that many of the concerns raised from the 2012 exhibition have been addressed within the 2013 exhibition.

However there are a number of issues which are considered to be reasonable concerns and may need to be addressed either directly or consideration for including mechanisms to address issues if and when they eventuate should the development proceed. These are:

List of issues which need to be fully responded / require more supporting documentation or additional analysis:

- Further justification as to the final traffic generation figures is provided;
- Consultation is recommended to be undertaken with the Transport for New South Wales to agree appropriate traffic generation level;
- Case study data from similar intermodal terms is undertaken.
- Additional supporting evidence in relation to the adopted distribution is required to justify why Cambridge Avenue will not be substantially impacted by SIMTA proposal;
- Consultation should be undertaken with Liverpool City Council and Bankstown City Council to identify which intersections were the subject of the concern.
- The issues in relation to the cumulative impact of the SIMTA proposal and MIT proposal that were raised by LCC, BCC, DoD, DoFD and within 4 private submissions in response to the 2013 exhibition documents are not unreasonable and this additional analysis should be undertaken.
- The timeframe should be assured that all essential on- and off- site infrastructure upgrade needs to be completed prior to SIMTA proposal operation.

List of issues / concerns that could be dealt with future conditions – ie monitoring and potential LATM

- In terms of access during construction it is considered that it would be more appropriate for this to be considered at later stages of the planning process as part of a construction traffic management plan;
- It is considered that at this stage the impact assessment of the local street is appropriate to
 recognise that this could occur however it is difficult to assess accurately. It is recommended
 that this concern could be mitigated by a condition for regular monitoring of local streets and
 triggers for implementation of local area traffic management to address any issues that may
 occur in the future;
- It is recommended that consultation should be undertaken with Transport for New South Wales to identify the infrastructure improvement in order to increase road network capacity in the inner area.

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