

Submissions Report Addendum
Mayfield Site Port-Related Activities Concept Plan
4 March, 2011

On the 24th of February 2011, NPC received a request for clarification from John L Hayes of the Correct Planning and Consultation for Mayfield Group regarding the inclusion or otherwise of a particular submission. A subsequent investigation revealed that whilst the submission in question had been received by DoP and logged as #109, a processing error had resulted in an incomplete recording of the entire submission.

NPC has since reviewed the full submission and identified that it was effectively a combination of three separable portions. Of these three, NPC has confirmed that one was submitted by Rennie Ferguson & Clare Hogue and captured as an individual submission (#101) and a response was provided within the current Submissions Report. Another portion was a compilation of multiple individual pro forma submissions, summarised and grouped by the Correct Planning and Consultation for Mayfield Group and these too have been addressed in the current Submission Report. The final portion, being a letter addressed to the Minister for Planning from the Correct Planning and Consultation for Mayfield was not considered due to it not being received.

The submission provided by Correct Planning and Consultation for Mayfield raises a number of issues that have already been addressed in the Submissions Report. The reference number for the submission and the section of the Submissions Report that these issues are addressed in are outlined in **Table 1-1**.

Table 1-1 Submission Received by Correct Planning and Consultation for Mayfield Group

Respondent	DoP Submission Number	Section of the Submissions Report Where Issues are Addressed
Individual Respondents		
Correct Planning and Consultation for Mayfield Group	178	3.1.2, 3.2.1, 3.2.3, 3.2.4, 3.3.1, 3.3.2, 3.3.3, 3.4.2, 3.4.3, 3.4.4, 3.12.1

The submission provided by Correct Planning and Consultation for Mayfield Group also raises a number of issues that have not been addressed in the Submissions Report. The following sections provide a summary of the new key issues raised in the submission and a response to each of these issues.

Summary of Issues

The following issues were raised by the respondent:

- a) Cumulative impact models should be developed for Newcastle for air quality and noise, similar to those prepared to assess the cumulative impacts of mining projects in Camberwell, NSW. It was suggested that Newcastle City Council manage development of the cumulative impact model, and that all major port and industrial operations provide funding for development of the models.
- b) There are a number of freight studies and government inquiries regarding freight origin/destination but none of these studies have been referenced in the EA. The EA contains little detail regarding freight analysis and relies solely upon freight origin/destination information provided by NPC in April 2010. It was requested that the information provided by NPC in April 2010 be made publically available and that a detailed freight analysis be undertaken for the project.
- c) The assumption that 50 percent of traffic associated with the proposed concept will access/egress Kooragang Island was questioned.
- d) The EA assumed that 75 percent of port operations and associated truck movements are to take place during the day, with the remaining 25 percent taking place at night. The EA did not explain the basis for this assumption.
- e) A multi-purpose port at Port Kembla is proposed to achieve a much higher modal split to rail with 90% of containers proposed to be transported by rail. Why cannot NPC adopt a similar benchmark by actively partnering with others in seeking to build new transport infrastructure.

Response

- a) Section 9.14 of the EA includes an assessment of the potential cumulative impacts of the proposed concept in the context of the existing and known major proposed developments in the area. As discussed in Section 9.14 of the EA, due to the long timeframe of the proposed concept and uncertainty as to future projects which may be approved, it is not possible at this stage to assess in detail the potential cumulative impacts that may occur in later years of the proposed concept. Therefore, the EA included a qualitative assessment of the likely cumulative noise and air quality impacts. Project applicants would conduct detailed, more quantitative assessments of cumulative impacts as part of separate Project applications based on existing conditions and known proposals at that time. This approach to the cumulative impact assessment for the proposed concept is consistent with the way cumulative impact assessments for Part 3A projects are typically conducted and was accepted by the DoP.

The cumulative impact assessment conducted for the mining projects in Camberwell is unique. In late 2008 and early 2009, the DoP received three new applications to expand open cut mining operations closer to Camberwell. Given public concern over the impact of the existing mining operations on Camberwell and considering that there is no community within the Hunter which has been impacted by open cut coal mining in the way that Camberwell has been, DoP considered that there was merit in an independent review of the cumulative impacts of mining on Camberwell. In early 2009, the DoP commissioned an independent review of the cumulative impacts of mining on Camberwell. The DoP's aim was to establish whether existing impacts on the community are acceptable and to examine whether future mining operations in the area should be restricted in some way. The independent review concluded that improved operational dust mitigation, proactive operational air quality management, and implementation of best practice noise management measures would be required. Of the three applications, one has been approved and two are still under assessment.

Should the DoP consider that there is merit in conducting an independent review of the cumulative air and noise impacts of all major port and industrial operations in Newcastle, NPC and/or Project applicants as appropriate would contribute to the review, such as by providing information used in the preparation of environmental assessments.

- b) Information provided by NPC is based on both the significant historical data and market research undertaken and retained by the Corporation and that drawn from a number of recent reports commissioned by both NPC and other Government agencies. These detailed reports and associated submissions and contributions from industry experts have been reviewed, analysed and referenced in numerous planning processes for NPC throughout the development of the concept plan. A summary of these follows in **Table 1-2** below.

Table 1-2 Freight Origin/Destination Studies

Agency	Title
Public	NSW State Plan
Public	State Infrastructure Strategy 2008 – 2018
Public	2003 NSW Ports Growth Plan
Public	Lower Hunter Regional Strategy
Public	Draft Newcastle Local Environmental Plan 2011
Public	Inquiry into Port Infrastructure in NSW, Report - 30 June 2005
Private	Container Terminal Analysis, Report – 2010 *
Private	Sea Freight Council Container Mapping Study – 2003 *

* This work references the following:-

ABARE, Australian Commodities, Vol 9 No. 3

BTRE – Waterline Issue No. 32

ABS, Report 13381 NSW State & Regional Indicators, Mar 2010

BTRE – Working Paper 50 – Australia's Seaborne Containerised Freight – Forecasts to 2010 - 11

TradeData International – ABS Statistics

AECOM, Port Kembla Outer Harbour Development Environment Assessment

Clarkesons, Forecast for Global Box Trade, June 2007 (Lloyds List DCN, 3 June 2010)	DOTARS (Sinclair Knight Merz), Sydney Urban Corridor Strategy, August 2007
Freight & Logistics Council of NSW, Draft Issues Paper, June 2009	Hunter Business Chamber, Submission to Inquiry into Port Infrastructure in NSW, Dec 2003
NSW Government, Cabinet Submission to the Standing Committee on State Development, February 2004	NSW Government, Infrastructure Audit Submission to Infrastructure Australia, June 2008
NSW Parliament, Legislative Council, Inquiry into Port Infrastructure in NSW – Standing Committee on State Development, report No. 30 June 2005	NSW Treasury, Five yearly Infrastructure Report to the Council of Australian Governments, January 2007
Railway Technical Society of Australia - Submission to Inquiry into Port Infrastructure in NSW, December 2003	Wollongong City Council, Submission to Inquiry into Port Infrastructure in NSW, December 2003
Sydney Ports Corporation, the Intermodal Logistics Centre at Enfield, January 2006	Strategic Design and Development et al, Freight Hub Hunter, October 2008

A detailed investigation and analysis of forecast trade mix and their respective origins / destinations had been conducted by NPC as part of it's ongoing port and trade development processes and is summarised in **Table 1-3** below.

Table 1-3 Export Cargo Origin

Export Cargo Type	Origin
Aluminium	Tomago, Kurri Kurri
Cotton	Macquarie Valley, Bourke, Namoi Valley, Gwydir Valley
Wool	West of Great Dividing Range, Armidale, Tamworth, Gunnedah
Meats	Tamworth, Singleton, Dubbo, Wingham, Scone, Wauchope
Wine	Hunter Valley, Mudgee, Orange
Grain packers	Narrabri, Tamworth, Moree, Minto

Import cargoes will include a combination of retail products (eg food, white goods, electrical) and industrial freight such as machinery, chemicals and project cargoes. Imports of bulk freight and containers currently arriving at Port Botany are typically transported to distribution hubs located at various locations within the Sydney Basin. From there, product is distributed in a range of transport modes further afield to destinations throughout the Sydney metropolitan region and further afield in New South Wales.

For freight currently destined for, and or en route through, Newcastle and the Hunter Region that will arrive via the proposed development at the Port of Newcastle, these will similarly be transported to local distribution hubs at key locations on major established transport routes. Final destinations and routes are yet to be determined due to that fact that these supply chains are yet to be established.

Therefore, given the level of information available on the future destination of imports to the Port of Newcastle it is not only appropriate, but only possible to undertake detailed analysis of the type, origin & destination of freight once future proponents submit Project Applications of which these studies will be an integral part.

- c) The revised Transport Assessment includes a revised assumption regarding traffic travelling to and from Kooragang Island. The revised Transport Assessment assumes that 20 percent of traffic will access/egress Kooragang Island via Tourle Street and Cormorant Road.

- d) The Transport Assessment included as Appendix D of the EA states that the assumption made regarding the 75 percent night/25 percent day split of port operations and truck movements was based on NPC's port operation experience and experience of how other major ports, such as Port Botany, operate in respect to the intensity of operations over a 24 hour period (eg. day vs night and AM/PM peaks) and the characteristics of how they manage the road and rail transport of cargos.
- e) A conservative 20 percent rail modal split was modelled for the Concept Plan in recognition of the fact that this is currently being achieved at other capital city container terminals in Australia. It is not a reflection of NPC's aspirational targets but rather allows NPC to analyse and plan for worst case scenario impacts of traffic movements arising from the proposed development.

As the NSFC project is progressively completed and more freight train paths become available on the Main North Line it is possible that the rail modal split could increase beyond 20 percent subject to a number of potential rail infrastructure upgrades occurring at the NPC site such as:

- The new exit road connecting to the Bullock Island Loop.
- Increase in the length and/or number of rail sidings within the site so that longer trains can be accommodated.
- Introduction of gantry loading operations as opposed to reach stackers.