

29 March 2018

Mr Tony Cahill  
Director  
Freight Industry Engagement Strategy  
[freight@transport.nsw.gov.au](mailto:freight@transport.nsw.gov.au)

Dear Mr Cahill,

**Submission to the NSW Draft Freight and Ports Plan**

Council would like to thank you for providing Council with the opportunity to review the NSW Draft Freight and Ports Plan. You will find Council's submission over the following pages.

Should you require anything further information please do not hesitate to contact Council's Executive Manager Infrastructure, Mr Kevin Lynch.

Yours sincerely,

Wayne Rylands  
**Director City Delivery**

- **Moorebank Intermodal – Cambridge Ave extension and up grade**

Council is of the opinion that this should be included in the plan.

The Moorebank intermodal will be a major and crucial piece of freight infrastructure that will also remove trucks from the network by increasing the use of freight to and from Port Botany and distribute the containers by road from Moorebank. The Moorebank Intermodal will concentrate trucks into this area and although close to the M5, is vulnerable to major interruptions to its operations as there is only one road that provides this connection to the motorway. The location of this connection is also one of busiest and most congested areas of the M5.

#### Six outcomes for our State



The draft plan discusses the options of having off peak freight only lanes on the existing road network as well as dedicated freight routes. The plan cites the above six outcomes for the State yet does not recognise the need for the Cambridge Avenue extension and upgrade to the motorway. The Cambridge Avenue connection if appropriately provided will address all the above six outcomes as well as address the site operational vulnerability of having only one access point.

The extension of Cambridge Avenue will not only provide a second access point to the Intermodal it will also provide the most direct link to the interchange of the M31 / M5 / M7 and avoid the current M5 connection and congestion. By avoiding this location one of the major outcomes of this plan would be achieved and provide a significant improvement to road safety with the removal of freight and other road user conflicts.

The State Government is currently planning the development of the Glenfield (Hurlstone Agricultural High School) precinct which is to be serviced by a section of the Cambridge Ave extension. Council finds it interesting that the planning process recognises the future connection to the intermodal whilst this Draft Freight and Ports Plan (DFPP) does not include it.

In saying this, it would appear that the Glenfield precinct planning pays minimal consideration to the significant truck movements that a 24 hour intermodal terminal will generate. The DFPP predicts that the container volumes in a 40kilometre radius from Port Botany (which includes Moorebank and the Campbelltown LGA) will increase from 20% of

the containers freight in 2009 to 35 % by 2045. Moorebank Intermodal will play a major role in the increase of container volumes and although the truck traffic between Port Botany and Moorebank will decrease and be replaced by rail, the volume and concentration of heavy vehicle traffic will exponentially increase around Moorebank.

The provision of the Cambridge Ave connection would provide a dedicated road freight connection that is an efficient safe direct connection to three major motorways.

Council is of the view that an opportunity exists to open trench construct a below ground truck only road along the proposed Cambridge Avenue corridor which would provide a direct link onto the M31, M5 and M7 motorways. This direct link would remove significant truck movements from the current interchange and return capacity and improve safety at the interchanges. The underground Cambridge Ave connection will also allow the trucks to access the three motorways independently of each other.

A truck only corridor will also allow the Government to satisfy another one of the plans objective of introducing smart technologies on this section of road allowing the platooning of trucks as well as the ability to merge trucks onto the freeway in a seamless staggered fashion.

It is imperative that this crucial link be recognised in the DFPP and that planning for this be undertaken now whilst the opportunity exists. This would reduce costs by using open trench construction with the vehicle road placed directly on top.

- **Western Sydney Airport - Glenfield rail interchange 'Y' Link**

Council is of the opinion that this should be included in the plan.

The DFPP highlights the possibility of freight and passenger services sharing the same line in some instances. With the proposed extension of the rail line from Leppington to the Western Sydney Airport, which is not indicated on figure 25 below, this link could become an important link to move sensitive freight to and from the airport.

Council has advocated for the inclusion of a 'y' link (see plan below) at Glenfield to allow direct access to the airport from the south without having to switch services. The proposed link becomes even more crucial when considering the benefits it would provide in the movement of sensitive freight. This direct link would provide significant cost and time efficiencies that in a short period would fund this link. Without this link the most cost effective method of moving this freight from the Western Sydney Airport to the south would be by road again adding more trucks onto the roads.

Couple this with the improved access to the Western Sydney Airport for passengers from the south and workers of the Aerotropolis this 'Y' Link in its self will become essential in terms of this plan, Western Sydney Airport and the Aerotropolis. The economic benefit alone it will provide will easily provide the capital outlay required.

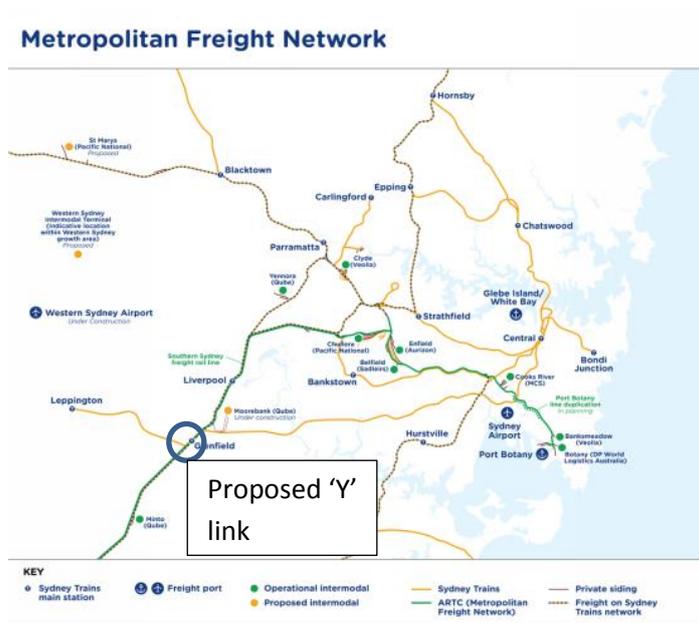


Figure 25: Metropolitan Freight Network

Council suggests that this link be included as part of this plan

- **Maldon – Dombarton rail link**

The plan fails to address the benefits that the Maldon - Dombarton rail link could have on freight movement requirements in the short term. This connection is only indicated on figure 37 as being an initiative for investigation (10 – 20 years) for Greater Sydney. The plan also indicates the ability for Port Kembla to expand and provide increased freight movement into and out of Sydney. The expansion of Port Kembla and an efficient rail connection could substantially reduce congestion in and around Port Botany and provide an alternate freight route to service Western Sydney that does not have to pass through the whole of greater Sydney. This rail link, which has already commenced construction, will provide benefit in terms of time and money as well as provide a less congested link to the Western Sydney Airport as well as to the future Outer Sydney Orbital.

The plan highlights the benefits in some shared networks between freight and passenger. This rail link could be a prime example. If this link was to be completed the increased access of passengers from Wollongong and the south coast to the Western Sydney Airport and Sydney in general would be improved immensely. It would provide the efficient link that could move people from cars onto public transport thus improving road safety on Appin Road, Picton Road and the M31. This connection would also benefit the sensitive freight movements between Sydney and the South Coast due to the time savings.

This link would provide Port Kembla with an improved market opportunity to transport products such as waste, building material and other general freight to one of the fastest developing areas in Australian being South West Sydney Region.

Port Kembla is the leading port for car imports. The Maldon - Dombarton link would reduce transportation times for vehicles from the port to Sydney which would mean less need for

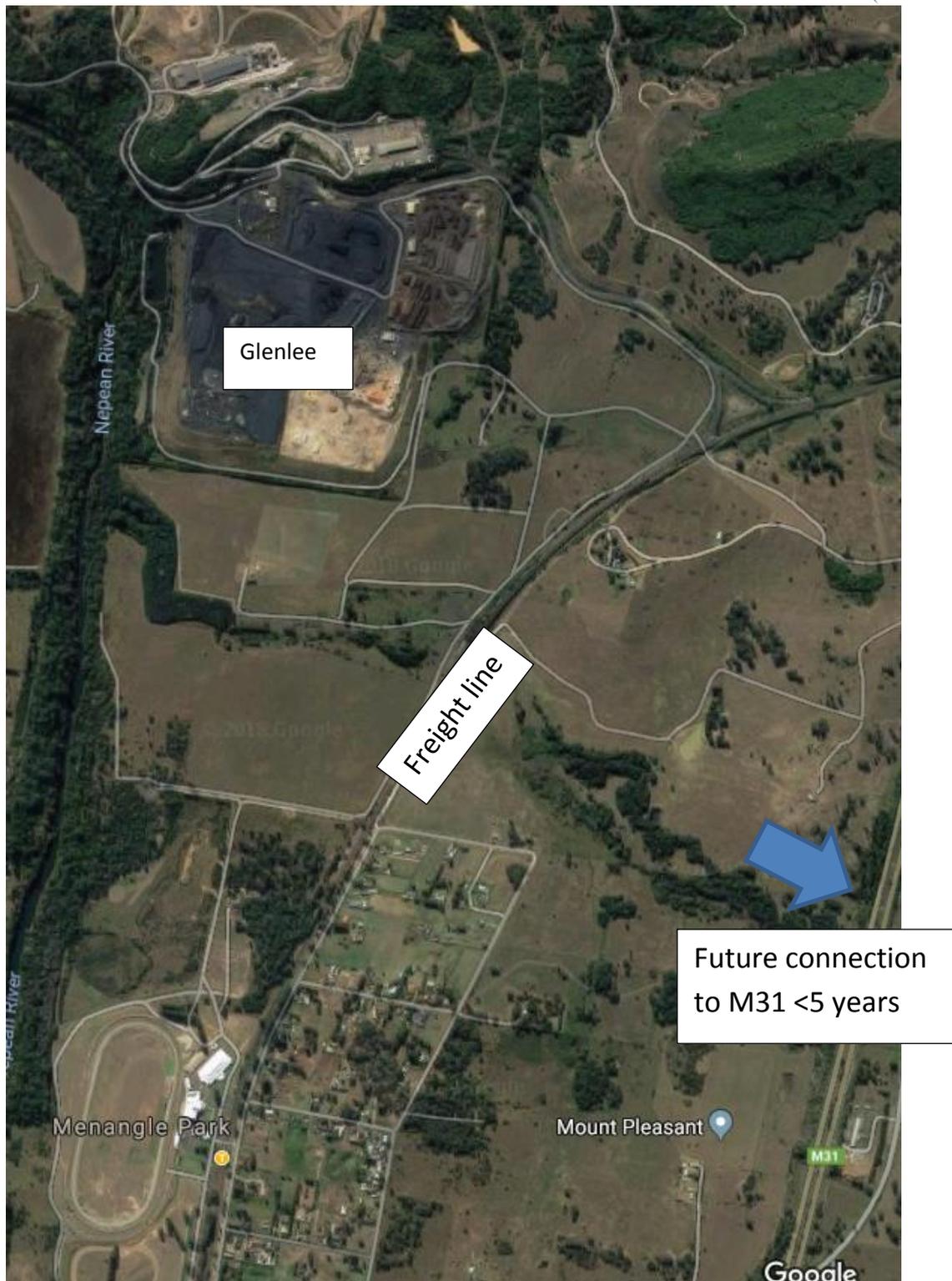
large vehicle holding yards in Sydney. Vehicle storage yards do not provide the most productive and effective use of the valuable land within Sydney. This link would allow bulk storage to occur at Port Kembla on land less valuable than those currently being used in Sydney.

The other advantage of this link would be to allow a greater advantage of the private sidings that exist and are approved within the Campbelltown LGA. By effective use of these sidings a reduction in truck movements along Appin and Picton Roads could be achieved. This initiative would also improve the safety along these two heavy traffic routes that experience high accident rates.

Private sidings currently exist at

- Glenlee
- Minto – Culvertstone Road, approved by not yet constructed
- Minto – Stoney Batter Road, currently operating

Council is of the understanding that these locations are the closest possible sites along the Southern Sydney Freight line where there is sufficient distance to accommodate a rail siding. As can be seen from the photo below the Glenlee siding is a large parcel of land that is undeveloped and therefore has the potential to be developed into a productive site. Once the Spring Farm Parkway is completed, which cuts along the edge of this site, it will be approximately 3kms from an interchange onto the M31. The Spring Farm Parkway is then planned to be extended to Appin Road and have future connection to the Sydney Orbital Road.



Council believes the investigation into the Maldon – Dombarton rail link should be brought forward and investigated and delivered in the short term.

- **Higher speed rail connections.**

The plan only mentions for the 10 – 20 initiatives for investigation of the corridor protection for higher speed connections as noted on figure 37. There is no mention of this initiative within the text of the document. Council assumes the plan is talking about rail connections and is disappointed terminology such a higher speed is used not high speed. The opportunity in Sydney to provide land for this type of link is now. To be investigating this opportunity in 10 – 20 years will only see the provision of such projects far more costly.

The use of high speed rail for both freight and passengers meets all the core objectives of this plan yet the plan fails to give it any importance. With the short term introduction of autonomous vehicles we need to provide the opportunity for people to access areas outside their immediate area of home and work. To remove the dependency on cars, it is imperative that we provide a complete solution and rail provides this opportunity.

- **Land use planning**

Council is of the opinion that this should be included in the plan.

The plan has not addressed any land use planning issues such as the preservation of land for functions associated with a freight network. The plan addresses the key pieces of infrastructure required but fails to consider other lands that may be required such as private rail sidings. The role that these types of facilities can provide in reducing truck travel distances and time needs to be recognised. There are only limited areas in Sydney where there are long enough lengths of straight track to allow for a rail siding to be introduced. If we lose these locations to other uses that don't require rail access, the ability for a broader spread of the freight functions is lost and therefore increased congestion at limit nodes occurs. These locations will allow for a speciality type of freight functions to occur in locations that may not be cost effective for the larger terminals to provide. It will also provide for containers to be broken down into smaller trains and moved to other locations where they can be unpacked and trucked from there.

The misuse of lands close to the siding and freight intermodals also needs to be prevented and addressed in this plan. As an example a development approval was provided a grain silo to be erected on lands with direct access to a rail siding. The development was approved based on the operator stating they were going to transport product using approximately 90% rail. Some years later they have requested that the DA approval be modified to reduce rail used to under 20 %. This has of course significantly increased the truck movements in the area as well as the size of vehicles. This outcome is against the overall objectives of this plan and therefore planning instruments need to be considered as part of this plan to ensure the objectives are maintained. The other downside is the ability to access this siding by other uses is removed. This infrastructure is now either underutilised or will be removed.

- **Additional Freight Rail capacity – Southern Sydney Freight line**

Apart from figure 37 in the initiatives for investigation (10 -20 years) for Greater Sydney there appears to be no further discussion on this topic. To investigate this in 10 to 20 years may have seen all opportunity lost and if not a whole raft of infrastructure built that needs to be modified. The DFPP needs to at least highlight the possible direction this could take such as the use of double decker containers, longer trains or the provision of an additional track. If the possible options are at least on the table then due consideration can be given to these as development occurs along the corridor.

The Glenfield to Macarthur corridor strategy has recently been released by the State Government which will see significant development along the Southern Sydney Freight Line yet there is no consideration in either document of what each is trying to achieve. There appears to be the need for a greater coordination between each of these documents and other similar documents and what the impacts are. Failure to at least acknowledge what the others documents can offer only means opportunities are lost.

- **Minto – Ingleburn truck only route**

Council is of the opinion that this should be included in the plan.

Council has for many years planned and advocated for a truck only connection between the industrial areas of Minto and Ingleburn. This connection will remove a significant number of heavy vehicles off Campbelltown Road and improve the safety and capacity of this road. This connection will also allow for a more direct access to a north and south bound on ramps to the M31. This road will also provide better and safer access to the two private rail sidings locations in Minto.

The improved access to the on ramps in the Ingleburn area will also reduce the number of heavy vehicles either using Blaxland Road or Moore Oxley Bypass as a more convenient link to the M31 on ramps on Narellan Road.



- **Spring Farm Parkway – south facing ramps**

Council is of the opinion that this should be included in the plan

The interchange of the future extension of the Spring Farm Parkway is expected to be completed in the next five years. Under the current plans the south facing ramps are not to be delivered. As can be seen in the picture above the provision of these ramps will have significant benefit of fully connecting the rail siding at Glenlee to the national road system and therefore enabling a greater utilisation of rail to move freight into and out of the city. By not providing these ramps access to this rail siding is very difficult and road freight will find it far more convenient simply to drive all the way into the Moorebank intermodal, thus increasing the congestion and safety on the very congested M5.

These ramps coupled with the Maldon Dombarton rail line again increase the cost effectiveness of rail freight and increases the amount of freight being moved by rail up to Glenlee before being off load onto trucks. This will reduce truck movements on the already dangerous Appin and Picton Roads.

These ramps will also provide an alternate route when Narellan Road is blocked to the west of the M31. Currently in this situation traffic needs to travel all the way through to Ingleburn and come back along Campbelltown Road or alternatively exit onto Picton Road. Both these routes take vehicles significantly longer to travel as well as forcing them to exit onto much lower order roads.

- **Duplication of Raby Road bridge over the M31**

Council is of the opinion that this should be included in the plan.

When travelling generally in a northerly direction past Leumeah you once could turn left into Campbelltown Road and head into the industrial areas of Minto and Ingleburn. Due to safety concerns with the off ramp from the M31 this right turn was banned. Traffic including heavy vehicles will now have to pass over the M31 and go up onto Raby Road. Vehicles then need to turn right onto Raby road where they are restricted to a one lane bridge over the M31. They then travel along a local road before being able to return to Campbelltown Road.

This narrow bridge causes a significant restriction and safety hazard and also restricts the size of vehicle that can access the area.