
Department of Planning, Housing and Infrastructure

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Implementation Plan:

Transport and Infrastructure SEPP - Chapter 6 - Moorebank Freight Intermodal Precinct

February 2025



Acknowledgement of Country

The Department of Planning, Housing and Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Introduction

This implementation plan has been written to support the operational implementation of Chapter 6 - Moorebank Freight Intermodal Facility of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (the SEPP).

The key function of the SEPP is to:

- identify certain development within the Moorebank Freight Intermodal Precinct (Precinct) as exempt or complying development
- provide a consistent planning regime for the development and delivery of the Precinct.

Purpose

This implementation plan is intended to clearly communicate requirements and expectations arising from the SEPP, to support its effective operation. The plan provides an overview of the traffic certification framework for the Precinct and establishes:

- the factors that the Planning Secretary will take into consideration with determining a traffic certificate application, which is a requirement of certain complying development applications
- minimum requirements for the collection of and access to traffic monitoring data
- baseline requirements for independent traffic audits and how they are triggered.

Status

This implementation plan is an operational plan developed between the Department of Planning, Housing and Infrastructure (the Department) and the Precinct operator. It establishes requirements to allow the provisions of the SEPP to operate effectively. It also captures the roles and responsibilities of the key parties. The implementation plan was updated February 2025.

Definitions

Heavy vehicle

An articulated truck falling within the COBA Classification of Other Goods Vehicle 2 (OGV-2) or rigid truck (COBA classification Other Goods vehicle 1).

Vehicle types that are not considered heavy vehicles include cars, buses and vans (COBA classification Light Goods Vehicle).

Heavy vehicle movement

A single movement undertaken by a heavy vehicle, either:

- inbound/entry or
- outbound/exit.

Therefore, a heavy vehicle that enters, and subsequently departs the Precinct would be counted as performing two movements.

Precinct

For the purposes of this plan, the Precinct means the land identified in the Chapter 6 - Moorebank Freight Intermodal Facility of the SEPP - land application map and any relevant roads and intersections, as specified in relation to the traffic monitoring and auditing frameworks (including any subsequent changes due to road upgrades e.g. Moorebank Avenue Realignment).

The Precinct referred to in this plan relates to the whole Precinct, not an individual development site.

Precinct operator

For the purposes of this plan, the Precinct operator means an entity named in a current Operational Environmental Management Plan for the Precinct.

Governance

A Moorebank steering group has been established to guide development of the SEPP and matters relating to development applications. Membership includes the Department, the Precinct operator and Transport for NSW (TfNSW), and is chaired by the Department.

The steering group provides a means to resolve any operational issues arising after the commencement of the implementation plan.

Approval of the implementation plan is required from the Department (on behalf of the Planning Secretary) and the Precinct operator.

Roles and responsibilities

The table below outlines the main stakeholders for this implementation plan and their specific roles and responsibilities.

Who	Role
The Department (Department of Planning, Housing and Infrastructure / Planning Secretary)	<ul style="list-style-type: none"> Oversees the implementation and operation of the SEPP Consent authority for traffic certificates Approves the independent traffic data provider and independent traffic auditor
Precinct operator	<ul style="list-style-type: none"> Management of the Moorebank Freight Intermodal Precinct (Precinct) Responsible for the funding and management of the contract with the independent traffic data provider Responsible for providing applicants with up-to-date traffic monitoring data Responsible for commissioning and implementing traffic audits
Applicants	<ul style="list-style-type: none"> Parties seeking to use complying development provisions within the SEPP Required to apply for a traffic certificate Should liaise with the Precinct operator to obtain approval for any works proposed and the necessary traffic information to support the traffic certificate application
Independent traffic data provider	<ul style="list-style-type: none"> Undertakes regular collection of traffic monitoring data to ensure that the specific trigger points can be appropriately monitored Management of access to traffic monitoring data for the Precinct operator and the Department Notifies both the Department and the Precinct operator when heavy vehicle movements reach a relevant threshold
Independent traffic auditor	<ul style="list-style-type: none"> Undertakes an independent traffic audit when required. This provider should be appointed by the Department and paid for by the Precinct operator. They will be independent from the traffic data providers who prepared the baseline traffic assessment or collects monitoring data.
Transport for NSW	<ul style="list-style-type: none"> Ongoing advisory role to the Department

Review

This plan will be reviewed by the steering group:

- after 12 months from its commencement
- at any point if the relevant provisions of the SEPP are amended
- as necessary to update and revise the operation of the traffic certificate framework.

Conditions of applicable development consent

Existing development consent condition obligations will continue to apply when undertaking development at the site as exempt or complying development.

Traffic certificate applications

Traffic certificates

The Environmental Planning & Assessment Regulation 2021¹ (EP&A Regulation) requires a traffic certificate to accompany complying development applications within the Precinct for:

- the erection or use of a building for:
 - freight intermodal facilities and freight support facilities
 - warehouse or distribution centres
- change of use for freight support facilities.

The Planning Secretary (or delegate) will determine applications for traffic certificates. These will be issued when the Secretary is satisfied that the development will not have an unacceptable impact on the safe and efficient operation of the surrounding road network.

The most relevant considerations will be:

- whether heavy vehicle traffic volumes remain below the applicable audit threshold
- if not, whether the audit indicated any failings within the road network directly resulting from the Precinct development
- if failings are identified, is a satisfactory plan / committed program of works in place to resolve them.

The issue of a traffic certificate does not warrant that the proposed works should or should not proceed as complying development, or otherwise permit the proposed development.

¹ Section 126(4)

Information needed for a traffic certificate application

Applications for a traffic certificate must be made via the [NSW Planning Portal](#).

The assessment focuses on the proposed complying development's impacts on heavy vehicle traffic movements within the Precinct.

All traffic certificate applications require the following information.

- the name, address and contact details of the applicant
 - (and of the landowner(s) where these are different parties)
- the address, and particulars of title, of the subject land
 - the onus is on the applicant to establish that the site falls within the Precinct
- a description of the development
 - this should be supported by relevant site plans and architectural drawings
- the gross floor area of any existing warehouse or distribution centres on the site.
- the gross floor area of the proposed warehouse or distribution centre(s) on the site subject to the application
- data about heavy vehicle traffic in the Precinct over the previous 6-week period
 - this data must be sourced from the traffic monitoring framework operated by the independent traffic data provider
- the impact of the development on heavy vehicle traffic in the Precinct, in terms of number of additional heavy vehicle movements per day within the Precinct
 - applicants should be prepared to justify how they have calculated this figure.

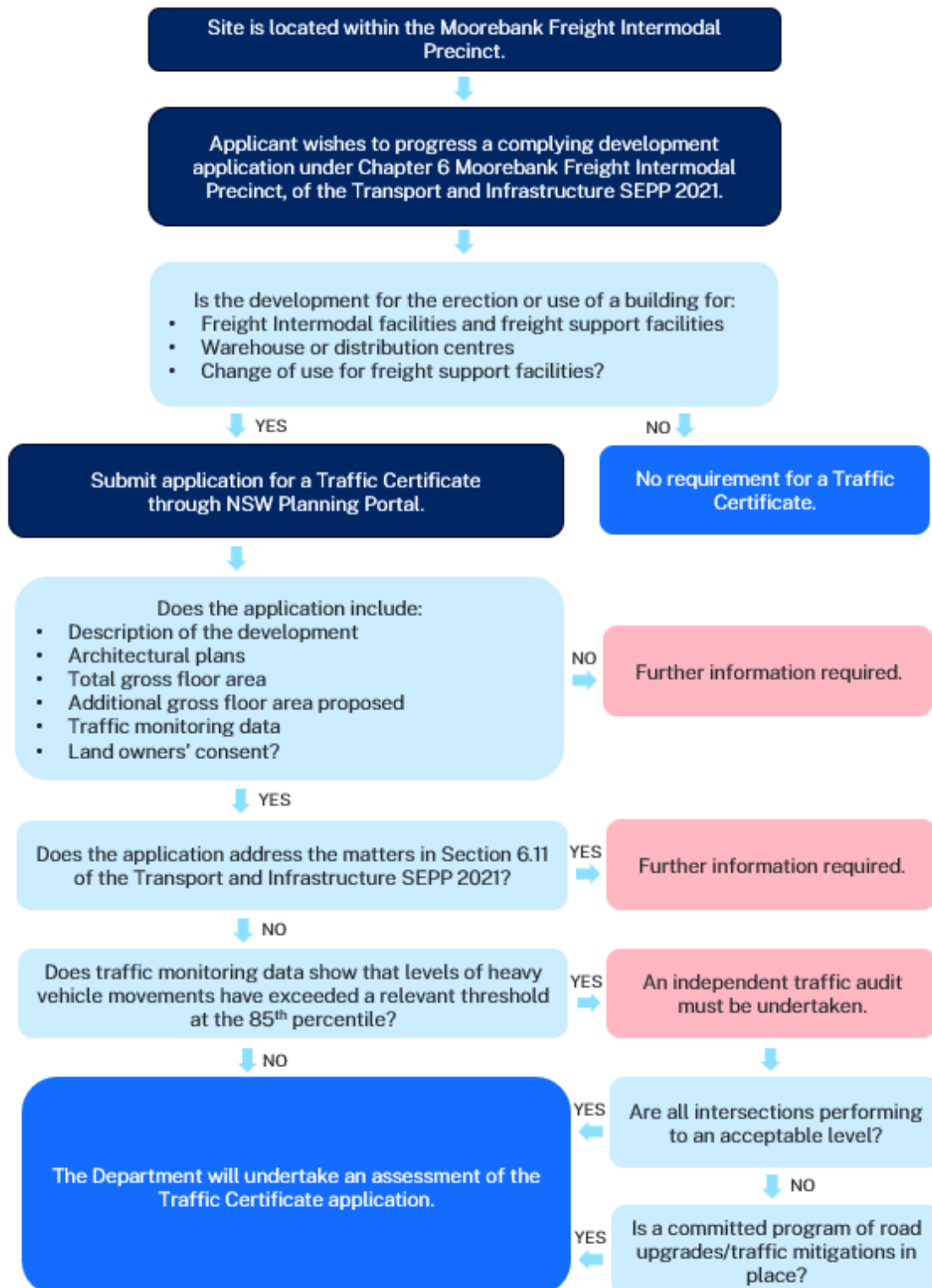
Landowner's consent

The SEPP requires any person seeking to carry out a complying development to obtain the landowner's consent before lodging a traffic certificate. Where the applicant is not also the landowner, they will be required to submit proof of this consent before an application will be assessed.

Traffic certificate application process

In this section, the process to apply for a Traffic Certificate is presented both as a flow chart below and as numbered steps on the next page.

Process flowchart



Process list

This process applies if a site is located within the Precinct, and the applicant wishes to progress a complying development application under Chapter 6 of the SEPP.

1. Is the development for the erection or use of a building for:
 - a. freight intermodal facilities and freight support facilities
 - b. warehouse or distribution centres
 - c. change of use for freight support facilities?

If yes to any of these, you need to submit an application for a Traffic Certificate through the [NSW Planning Portal](#). Continue to question 2.

If no, you are not required to obtain a Traffic Certificate and can disregard questions 2 to 5 below.

2. Does your application include all of the information needed for a traffic certificate application (see 'Information needed for a traffic certificate application' and 'Landowner's consent' above for details)?

If yes, continue to question 3.

If no, further information is required to progress your application.

3. Does your application address the matters in section 6.11 of the Transport and Infrastructure SEPP 2021?

If yes, continue to question 4.

If no, further information is required to progress your application.

4. Does traffic monitoring data show that levels of heavy vehicle movements have exceeded a relevant threshold at the 85th percentile?

If yes, an independent traffic audit must be undertaken. Continue to question 5.

If no, the Department will undertake an assessment of your Traffic Certificate application.

5. Does the independent traffic audit show all intersections perform to an acceptable level?

If yes, the Department will undertake an assessment of your Traffic Certificate application.

If no, continue to question 6.

6. Is a committed program of road upgrades or traffic mitigations in place?

If yes, the Department will undertake an assessment of your Traffic Certificate application.

If no, return to question 6 before proceeding.

Application fee

Traffic certificate applications will need to be accompanied by the fee prescribed in the EP&A Regulation². The fee will be 4.38 fee units. The dollar value of this fee will increase annually in line with the Consumer Price Index.

Application fees are non-refundable in the event that an application is withdrawn.

² Environmental Planning & Assessment Regulation 2021 (Schedule 4)

Determination

The Planning Secretary may request that an applicant provide any additional information considered necessary to properly consider the application.

Before the Planning Secretary will issue the traffic certificate, they must be satisfied that the:

- application meets all the requirements, including providing all relevant information and the application fee has been paid
- proposed development will not have an unacceptable impact on the safe and efficient operation of the surrounding road network.

Relevant factors to consider will include:

- Is the traffic monitoring data provided:
 - current (for the previous 6 weeks);
 - collected in accordance with the prescribed traffic monitoring framework
 - sourced from the independent traffic data provider.
- Do heavy vehicle movements exceed (or are they likely to exceed as a result of the proposed development) either:
 - the maximum capacity of the Precinct (10,798 heavy vehicles per day); or
 - a relevant interim threshold³ for the undertaking of an independent traffic audit.

Where relevant:

- Has an independent traffic audit been undertaken?
- Does the independent traffic audit demonstrate that the performance of the surrounding road network has deteriorated against the baseline traffic assessment or the most recent previous audit?
- If so, have road upgrades and traffic mitigation measures (as required as part of an existing condition of consent or identified through a subsequent audit) been completed satisfactorily?
- If the development is for the purposes of warehouse or distribution centres, will it result in the gross floor area (GFA) of all buildings used for warehouse or distribution centres in the Precinct exceeding 1,220,000m²?

³ See section entitled 'Audit trigger points' for the defined interim thresholds

Assessment timeframes

A determination of a traffic certificate application should be made within 14 days from submission, where all information requirements have been met.

Expiry of traffic certificates

A traffic certificate issued in accordance with the provisions in the SEPP will expire after 12 months from the day it is issued.

Cessation of traffic certificates

Traffic certificates can no longer be issued once:

- the development results in the gross floor area of all buildings within the Precinct used for warehouse or distribution centres exceeding 1,220,000 m², or
- the maximum threshold of 10,798 heavy vehicle movements per day within the Precinct has been reached.

Traffic monitoring framework

A traffic monitoring framework is necessary to understand the volume of heavy vehicle traffic being generated by development within the Precinct.

The key purpose of the traffic monitoring framework is to support the traffic certificate process by reporting on when heavy vehicle movements exceed certain thresholds, thus informing the timing of:

- independent traffic audits
- the Precinct reaching its maximum operating capacity for heavy vehicle movements (thereby causing the cessation of the traffic certificate process).

The technical specifications and practical implementation of the traffic monitoring framework have been informed by a baseline traffic assessment⁴.

Operation

The traffic monitoring framework is to be operated by an independent traffic data provider, approved by the Planning Secretary, and funded and managed by the Precinct operator.

Traffic data requirements

The traffic monitoring system records heavy vehicle movements in and out of the Precinct.

It will also capture data on:

- heavy vehicle movements at internal access points
- the direction of travel (whether trucks are entering or exiting the Precinct).

System technology

The traffic monitoring framework will include as a minimum:

- high-definition camera hardware
- video analytics software.

⁴ Moorebank Freight Intermodal Precinct undertaken by Ason Group April-May 2022

Traffic monitoring locations

Heavy vehicle movements must be counted on the direct access roads that connect the Precinct to the local road network. At present there is a single direct access road from Moorebank Avenue. Data must be collected from this location on commencement of the traffic monitoring framework.

As Precinct activity grows and additional access roads are opened, the monitoring framework will be adapted and expand to cover all operational heavy vehicle access points to the Precinct.

Based on the current master planning work, the proposed heavy vehicle access points are:

- 1 main access to Moorebank Precinct West at the future Moorebank Avenue / Anzac Road signalised intersection.
- 3 access points to Moorebank Precinct East warehousing at separate signalised intersections with the future Moorebank Avenue Realignment Road.
- 1 main access to the import/export intermodal terminal (IMEX IMT).

Sample data set

Traffic should be monitored on a 24/7 basis, with the capability to report recorded actual heavy vehicle movements per day. It should also be possible to break down data to hourly movements to support analysis of movements during different traffic periods e.g. peak commuter periods.

The chosen sample set of data against which heavy vehicle movements are reported may significantly affect overall understanding of traffic volumes within the Precinct. Traffic volume data is particularly susceptible to daily and seasonal variations. Similarly, warehouse and logistics operations can also be subject to variations across a year.

This has the potential to skew the assessment of traffic generation within the Precinct in the following ways:

- Seasonal peaks (e.g. a busy summer festive period) may lead to an overestimate of average heavy vehicle movements, and an impression that network performance is worse than would typically be experienced.
- Weekend activity may lead to an underestimate of average heavy vehicle movements, if included. This may give the impression that network performance is better than would typically be experienced.

To account for these factors, data reporting will:

- include weekdays only (removing data for Saturdays, Sundays and public holidays)
- show the rolling average of heavy vehicle movements based on 12 months of weekday data⁵.

Reporting against thresholds

How heavy vehicle traffic data is collected, assessed and reported may influence the interpretation of when relevant heavy vehicle movement thresholds are breached. For instance, the monitoring framework may be focused on identifying either:

- the initial instance when daily thresholds are exceeded, or
- the point at which vehicle movements consistently breach thresholds, indicating a sustained impact on the performance of the road network.

To allow for meaningful reporting against the relevant interim thresholds, the following figures should be available daily:

Actual heavy vehicle movements

The daily count of heavy vehicle movements. This will exceed any given threshold first, but the initial instance will not be representative of typical volumes and it may be some time until heavy vehicle movements exceed the threshold on a sustained basis.

85th percentile volume

This is the recorded volume that is greater than (or equal to) 85% of the samples in the sample data set. When this figure is greater a given threshold, it demonstrates it is being exceeded at least 15% of the time.

The threshold will be considered breached when the 85th percentile volume exceeds the relevant threshold.

If the threshold is an interim threshold, an audit is required to verify that the road network is operating safely and efficiently.

⁵ Initially 12 months of data would not be available, up to this point the sample set should include all weekday data collected from the commencement of traffic monitoring, including any interim arrangements for data collection prior to implementation of the full traffic monitoring system.

Reporting platform

The monitoring system proposed should be able to export the data to a customisable dashboard allowing users to gain insights – both live and historic – about the operating performance.

The dashboards should also be set up to provide notifications, most importantly being notifications advising of heavy vehicle volumes approaching the adopted traffic thresholds.

Access to monitoring data

The frequency and method of access to traffic monitoring data reporting will vary depending on the party:

Party	Access requirement
Precinct operator	requires access to live reporting of data
The Department	requires access to live reporting of data available via a website managed by the Independent traffic data provider
Applicants	require access to the previous 6 weeks of data, on request from, and via a means agreed with, the Precinct operator

Interim arrangements for traffic monitoring

It is anticipated that the full traffic monitoring framework will have a lead time to procure and build.

The current data trend (taken from Biannual Trip Origin Destination Report data) suggests that daily heavy vehicle traffic generation increases by approximately 400 trips every 12-months. Heavy vehicle traffic generation relies upon many factors; however, in very basic terms, if the growth in heavy vehicle traffic measured over the last 12-months was to be maintained, the initial 25% threshold would not be reached until 2027.

To support rapid implementation of the SEPP, traffic data could be sourced from either:

- existing terminal systems operated by the Precinct operator; or
- temporary camera installations deployed for the existing single access point. These could continuously record video data that should be collected from site on a weekly basis and analysed for the traffic data extraction and subsequent reporting.

These interim arrangements could operate until 31 December 2022 whilst the traffic monitoring framework is brought into operation.

Independent traffic audits

An independent traffic audit is an in-depth assessment of the road network surrounding the Precinct, including key intersections, undertaken by an independent third-party traffic consultant. This provider needs to be independent from the traffic data provider and the traffic consultant who prepared the baseline assessment for the Precinct.

The purpose of traffic audits is to aid understanding of the current performance of the surrounding road network, relative to the traffic baseline assessment. Audits will enable an understanding of any deterioration of performance over time and consideration of what can be directly attributed to heavy vehicle traffic growth from the Precinct and to other sources of traffic.

Traffic audits are a key input into the Planning Secretary's consideration of traffic certificate applications as they will help to identify whether the road network is performing safely and efficiently.

Audit trigger points

An independent traffic audit will be required where traffic monitoring data shows levels of heavy vehicles visiting the Precinct reach the interim thresholds of 25%, 50% and 75% of the capacity of the Precinct⁶.

Under the full build scenario traffic numbers specified by the concept approval, the heavy vehicle numbers associated with the interim thresholds are:

- 25% - 2,700 heavy vehicles per day
- 50% - 5,400 heavy vehicles per day
- 75% - 8,100 heavy vehicles per day.

The trigger point for the audit will be when the 85th percentile heavy vehicle count exceeds the threshold i.e. when the threshold is exceeded on at least 15% of days.

This will allow for natural fluctuations in heavy vehicle movements and occasional peaks in a way that would not be possible if the actual vehicle movements per day was the target measure.

⁶ The audit trigger points for the Traffic Certificate process relate to the entire Precinct and differ from the conditions relating to traffic audits set out in existing consents e.g. MPW Stage 2 MOD1 which requires an audit when the actual number of Moorebank Precinct West Stage 2 heavy vehicle movements first exceeds 1000 per day, and also when container freight throughput on the Moorebank Precinct West site reaches 50,000 TEU, 250,000 TEU and 500,000 TEU.

Traffic audit and approval process

A traffic audit is triggered when traffic monitoring data identifies a threshold has been exceeded at the 85th percentile.

The Precinct operator would seek Planning Secretary endorsement for the Independent Traffic Auditor to undertake an audit and confirm the scope of the audit.

Traffic audit is to be completed per the methodology outlined within this Implementation Plan.

The audit must be undertaken by the Independent traffic auditor and submitted to the Precinct operator and the Department within 90 days.

If the audit shows all intersections are performing to an acceptable level, the traffic certificate process will continue with the audit trigger being elevated to the next threshold.

If the audit shows one or more intersections are performing below an acceptable standard⁷, the Planning Secretary will decide if further investigation is required, and the Department will inform the Precinct operator.

In either case, the traffic certificate process may continue if the Planning Secretary is satisfied that there is a committed program of works in place or suitable traffic mitigation measures have been proposed, to resolve any deficiencies identified by the audit.

Audit scope

The scope and minimum requirements for an independent traffic audit have been established through the baseline traffic assessment.

A traffic audit does the following:

- Confirms current heavy vehicle movements
- Reports on various key metrics that demonstrate the performance in terms of efficiency of key intersections within the network
- Reports on the performance of the surrounding road network in terms of safety
- Reviews the change in performance over time versus the baseline and most recent audit (where relevant)
- Reports on the delivery progress of previous upgrades
- Considers any traffic related issues raised by TfNSW or council

⁷ Reported as the Level of Service for the intersection in terms of Average Vehicle Delay – see page 17 for details.

- Where required, updates traffic forecasts to inform likely timeframes for implementing any road network improvements before performance reaches an unacceptable level.

Audit methodology

Traffic baseline assessment

The traffic baseline assessment provides a reference point for the current performance of the road network.

In setting this initial baseline, it will be possible to monitor any deterioration in road network performance as the Precinct is developed further and associated heavy vehicle movements increase.

The traffic baseline assessment also defines appropriate standards for data collection, analysis and reporting.

Methodology

In summary:

- Vehicle count data should be collected across a 72-hour period from Tuesday to Thursday (inclusive) (excluding weeks including public holidays).
- To account for any changes in the road network, intersections will need to be confirmed prior to each audit at the point when the choice of Independent Traffic Auditor is endorsed by the Department. It is currently anticipated that data should be collected at the following intersections⁸:
 - Glenfield Road / Railway Parade / Cambridge Avenue / Canterbury Road
 - M5 Westbound Ramps / Hume Highway
 - M5 Eastbound Ramps / Hume Highway
 - M5 Motorway / Moorebank Avenue
 - Moorebank Avenue / Anzac Road
 - Heathcote Road / Newbridge Road
 - Main Access / Moorebank Avenue.

⁸ Full details of intersections and locations can be found in the Baseline Traffic Assessment.

- Traffic volume data (both heavy and light vehicles) should be collected for each intersection, and key performance metrics produced for each approach and the intersection as a whole.
- The data should be analysed to produce the following key performance metrics:
 - **Delay** - Also known as average vehicle delay (AVD), which is expressed in seconds. The delay or AVD is measured across all vehicles in a signalised intersection and for the worst movement in a priority-controlled intersection.
 - **Level of service (LOS)**: An indication of critical AVD in any intersection, denoted by the alphabetic letters from A to F. AVD in the range of LOS A up to LOS D is considered acceptable.
 - **Degree of saturation (DOS)**: The ratio of volumes by capacity. The maximum acceptable DOS for signalised and roundabouts intersections are 0.90 and 0.85, respectively.
- the performance should be assessed and presented for both AM (0600-0900) and PM (1500-1800) peaks.

Appendix A ('Traffic Audit Framework Report', Ason Group 2022) to this Implementation Plan contains the modelling parameters and assumptions used in the traffic baseline assessment, which should be replicated for future audits.

Road upgrades

The audit process provides an opportunity to establish progress on the delivery of required road upgrades and traffic mitigation measures arising from the existing conditions of consent for the Precinct. This should be summarised in the resulting audit report.

The audit will not make any comment on further road upgrades or traffic mitigation measures. Instead, it will be used primarily to verify efficient and safe performance of the surrounding road network.

The audit will provide verification of whether planned delivery of required road upgrades and traffic mitigation measures are consistent with achieving an acceptable level of performance for the surrounding road network in terms of its efficiency.

Decisions regarding the road upgrades required and how they affect the issuing of certificate will be considered, noting that some upgrades are not the responsibility of the Precinct operator. The Planning Secretary may consider the program of upgrades and the timing before determining whether it remains appropriate to continue to issue traffic certificates.

It is not the purpose of the SEPP or the audit process to seek to renegotiate any voluntary planning agreements, compel the Precinct operator to deliver upgrades that are the responsibility of a third party or require significant additional upgrades beyond that contemplated in existing development consents. If complying development results in the acceleration of construction at a faster pace than contemplated by existing consents, then the timing of road upgrades may need to be reviewed.