



Ms Carolyn McNally  
Secretary  
Department of Planning and Environment  
GPO Box 39, Sydney NSW 2001

6 September 2017

Dear Ms McNally,

Viva Energy welcomes the opportunity to contribute to the Interim Land Use and Infrastructure Implementation Plan (Interim plan), with particular regard to the Camellia precinct within the Greater Parramatta Priority Growth Area.

Viva Energy's Clyde Terminal (and the adjacent Parramatta Terminal) is the largest industrial land holding on the Camellia peninsula and has been in operation, originally as a refinery, for over 90 years. The Viva Energy operations at Clyde supply approximately 30% of NSW liquid fuel needs and are a critical supply point for Jet fuel to Sydney Airport via a dedicated pipeline from the facility. The Clyde Terminal plays a critical role in delivering fuel safely and efficiently to both metropolitan Sydney as well as the broader NSW market. The vast majority of fuel is supplied to the terminal by pipeline, and is subsequently distributed to customers across the state by road transport. A small quantity of ethanol (E100) is delivered by truck to the Parramatta Terminal for blending into E10.

Pipeline delivery from central Sydney to the growth suburbs in Western Sydney is the most efficient means of transporting bulk fuels to the geographic heart of Sydney and circumvents the need for hazardous vehicle movements through the Sydney port areas and residential zones in Sydney's east. The terminal's Western Sydney location provides an ideal base for efficient distribution by road, reducing travel distances and the number of trucks on Sydney roads. Given the benefits of this location to the Sydney fuels supply chain, and the significant investment that Viva Energy has made to this site, Viva Energy intends to remain on the Camellia peninsula and continue to operate a major fuels storage and distribution hub for many years into the future.

The Viva Energy land holding is shown in Figure 1. Viva Energy is currently undertaking a significant capital project (SSD-5147) at the Clyde Terminal to transform the existing refinery assets to a more efficient fuel storage and distribution facility. A large quantity of land surplus to ongoing operational requirements is expected to be made available at the conclusion of the project.

Viva Energy does not oppose the Interim plan and recognises that it is intended to provide guidance for ongoing future development and planning of the Greater Parramatta Priority Growth Area. As such, we understand it is subject to revision and enhancement as input is received from a range of stakeholders. Given the strategic importance of the industrial activity that we undertake in this precinct and its importance to the NSW economy, Viva Energy is keen to contribute to the development of the Plan, with emphasis on areas of concern that will require continued focus when planning the future development of the Camellia peninsula in particular.



Figure 1- Viva Energy land holding in Camellia

### Road Transport Access – Camellia Peninsula Heavy Vehicles

One of the key actions addressed in the Interim plan comprises development of a traffic and transport solution for the Camellia precinct, given that *“access to and from the precinct is a challenge with only two roads into the precinct”* with a *“significant volume of heavy vehicle traffic... with many intersections currently at or beyond capacity”* (as per Greater Parramatta Background Analysis Part 2 p46). Viva Energy welcomes the opportunity to contribute to the planning for improved transport connections particularly given the vast majority of the State’s fuel supply is dependent on effective and efficient road transport.

The distribution of fuels from the Clyde Terminal to retail and customer sites necessitates a substantial road transport logistics activity. This requires safe and efficient access from the site to major arterial roads at all times of the day and night. It is a critical condition of current and future development plans that these heavy vehicle transport routes are clearly identified, with any upgrades or infrastructure works implemented prior to development of a Camellia residential ‘town center’ and/or commercial areas.

The development of effective transport routes should ensure that thoroughfare through residential and urban centers is avoided. This is required to limit the impact of heavy vehicle traffic on residents, particularly regarding safety and noise concerns (especially at night), recognising that logistics operations take place 24 hours a day. Furthermore, heavy vehicle transport routes should direct traffic as efficiently as possible to main arterial transport links so as to minimize local impact.

In addition, the heavy vehicle transport routes need to provide safe intersections for relatively slow-moving fuel transport vehicles to join traffic flow. Bridge and road developments should be assessed for heavy vehicle requirements into the future including the accommodation of high performance

vehicles and larger combinations. Proposed changes to signage, traffic controls and/or landscaping improvements to roads should be carefully assessed and not impact on driver visibility.

Viva Energy supports the Interim plan's intention to develop transport solutions, particularly for heavy vehicle transport of hazardous materials, and the priority focus *"to divert heavy vehicles from travelling through the future Camellia Town Centre"* (as per Greater Parramatta Background Analysis Part 2 p48). To this end, the NSW Government's Hazardous Industry Planning Advisory Paper No 11 - Transport Route Selection provides appropriate guidelines and a holistic approach to the consideration of route options, balancing safety, road network capability and operational and economic factors.

It is critical that transport routes through the Camellia precinct are constructed as a prerequisite to any future Town Centre development and Viva Energy would welcome the opportunity to be involved in the planning of new road infrastructure.

### **Major Hazard Facility – Risks of proximity to residential and urban areas**

Viva Energy's Clyde Terminal operates as a Major Hazard Facility (MHF) classified under the Work Health and Safety Act 2011, which is an industrial facility that stores significant quantities of dangerous goods – predominantly flammable petroleum products. Viva Energy supports the assertion in Hazardous Industry Planning Advisory Paper No 4 (HIPAP 4) indicating that *"particular care needs to be taken when assessing rezoning or development around potentially hazardous development to ensure that such development will not introduce or aggravate existing land use safety conflicts"*. In addition, HIPAP No. 10 indicates that it is important to ensure that *"exposure to risks from existing industrial development are not increased by changes in land uses surrounding such development."*

Viva Energy is committed to best-in-class operations and is appropriately licensed and regulated to minimize the likelihood of any incident that may affect neighbouring properties. Nonetheless, it is critical that the planning process and any potential future rezoning of nearby land is cognisant of the potentially hazardous nature of MHF operations, particularly as further development of the area creates pressure and demand for increased urbanization and residential zoning across the peninsula. Appropriate buffer zones must be maintained to ensure viable ongoing terminal operations (particularly as demand for fuels grows within the Greater Parramatta Priority Growth Area and Sydney more broadly) without increasing risk to the general public and/or nearby businesses or residents.

Viva Energy will continue to work with Department of Planning and Environment Hazards group to ensure better awareness and consideration of hazards inherently present in a MHF facility in the further planning and development of the Camellia peninsula. To this end, we support the development and release of a Land Use Safety Study Report for the Camellia precinct by the Department of Planning and Environment's industrial hazard section.

### **Clyde Terminal Site Boundary and Surplus Land**

Viva Energy acknowledges the significant planning and infrastructure investigations that are underway in Camellia and Greater Parramatta to Olympic Peninsula (GPOP) region. Viva Energy supports the provisional Heavy Industrial Zoning (IN3 Zone) for the site under the Interim Plan as it reflects the existing zoning under the *Parramatta Local Environmental Plan 2011* (Parramatta LEP) and is appropriate for Viva Energy's operational activities.

Given that the Clyde Terminal represents critical infrastructure for the State, its long-term viability must be protected from urban encroachment and any neighboring future land use must be compatible with the requirements of Viva Energy's fuel terminal. This was clearly identified in the Greater Sydney Commission's 'A Plan for Growing Sydney' which indicates *"proximity to industrial uses and other*

*associated issues require detailed investigations”, while advocating for use of the Industrial Lands Strategic Assessment Checklist which “allows for evidence-based decisions and aims to prevent encroachment on important industrial sites”.*

Whilst Viva Energy is intending to continue to operate its fuel storage and distribution terminal at Camellia Peninsula for many years to come, it is expected that as a result of executing the Clyde Terminal Conversion and Remediation Projects there will be land in the western area of the site surplus to ongoing operational needs. Viva Energy is also undertaking an assessment of the entire land holding to determine future operational and land area requirements. This investigation may determine further opportunities to refine the boundaries of MHF operational areas and buffer zones for surrounding landing holdings, which will in turn inform the total amount of Viva Energy surplus land that will become available.

Viva Energy wish to maintain an active dialogue with DPE to determine the extent of the Heavy Industrial zone in relation to Viva Energy’s future land requirements and the potential availability of surplus land for future and long term employment uses in the precinct.

### **Jet Fuel Pipeline Easement to Western Sydney Airport**

Pipelines are the safest and most efficient means to move large volumes of fuel and reduce the number of trucks on the road. Viva Energy is currently contributing to consultation by Transport for NSW regarding future pipeline routes for jet fuel delivery to the planned Western Sydney Airport. One of the viable pipeline routes runs from the Camellia Peninsula to the Badgerys Creek area, potentially through the Greater Parramatta Priority Growth Area. Viva Energy recommends that future pipeline easement options are taken into consideration in the Interim Plan and the planning for the future Western Sydney Airport in order to ensure an efficient Jet fuel supply chain that will substantially reduce heavy vehicle traffic between Parramatta and Western Sydney.

### **Summary**

Viva Energy supports the Government’s priority to “*plan for the entire precinct holistically*” while retaining industrial zones and building on “*the precincts strategic location for freight distribution*” (as per Greater Parramatta Background Analysis Part 2 p48).

In summary, in parallel with the natural focus on the potential availability of surplus land for future and long term employment uses in the precinct, Viva Energy requests due consideration of the issues raised in relation to the ongoing fuel storage and distribution activities at Clyde Terminal, which include:

- Development of safe and efficient heavy vehicle transport routes into and out of the Camellia Peninsula, that avoid urban centers or residential areas, with any upgrades or infrastructure works implemented prior to development of new residential or commercial areas.
- Ongoing consideration of the potentially hazardous nature of MHF operations with respect to land use planning/rezoning around the Clyde Terminal to ensure no increase in risk to the general public or nearby premises, and to ensure terminal operations and the strategically important fuel supply activities remain viable into the future.
- Development of a Land Use Safety Study for the Camellia precinct by the Department of Planning and Environment’s hazard specialists.
- Coordination with Transport for NSW regarding planning for future pipeline corridors and easements to facilitate jet supply to the Western Sydney Airport.



Viva Energy plans to be a long term member of the Camellia peninsula business community and will continue to support the economy through the safe, reliable and efficient supply of fuel to meet the needs of both Sydney and NSW more broadly. We welcome the opportunity to contribute to the future growth of the Greater Parramatta area both through our business activities and as a significant landowner on the Camellia Peninsula, and look forward to ongoing discussions and further consultation in due course.

Should you wish to discuss any aspect of our submission, please contact me on 0407 539 364 or at [julie.seymour@vivaenergy.com.au](mailto:julie.seymour@vivaenergy.com.au).

Yours Sincerely,

A handwritten signature in black ink, appearing to read "Julie Seymour".

Julie Seymour  
Clyde Terminal Conversion Manager