



Friday, 24 February 2017

NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Karen Harragon
Director
Social and other Infrastructure Assessments
Your Ref: SSD5560 MOD1; 10_0193; SSD 7628

Dear Madam,

Joint exhibition of three SSD applications: Moorebank Precinct West – response to submissions concept plan modification SSD 5506 – MOD 1; Moorebank Precinct East - concept plan modification MP 10_0193 MOD 2; and Moorebank Precinct East - stage 2 application SSD 7628.

I refer to the above three projects.

ABB Australia Pty Ltd (**ABB**) owns land at 1 Bapaume Rd, Moorebank (**ABB Site**), which adjoins the proposed Moorebank Intermodal Project, the subject of the three projects.

On 22 December 2016, ABB received a letter (dated 14 December) advising of the exhibition of further assessment documents for the above three projects and seeking submissions by 3 February 2017. Maddocks Lawyers wrote to the Department of Planning seeking an extension to that date. The Department responded by letter of 11 January 2017 extending the date for submissions to 24 February 2017.

ABB does not wish to impede the Intermodal Project but also does not want that project to impact its operations and use of its site generally. The Intermodal project is one of the largest developments in Sydney. The environmental assessment documents run to many thousands of pages. The potential for impacts on the ABB Site and ABB's operations is significant. The consultation periods are simply insufficient for ABB to properly understand the impacts and respond. As a result ABB needs a period of ongoing consultation with SIMTA, which I understand SIMTA is prepared to facilitate. However, in the meantime the public consultation process will no doubt proceed and so ABB has set out its concerns for your consideration.

ABB is currently concerned with a number of aspects of the Intermodal Project, in particular:

1. Drainage in the vicinity of the ABB Site including both during construction and operation phases of the Intermodal Project in the vicinity of the ABB site including:
 - The completeness, accuracy and adequacy of the modelling of the surface stormwater flows;
 - the proposed use of the ABB Site to drain the development; and
 - effects on PCB contamination on the ABB Site;
2. Traffic movement including changes to the access arrangements into and in the vicinity of the ABB site;
3. Noise and dust – in particular during the filling of the intermodal site.

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Page 1 of 10

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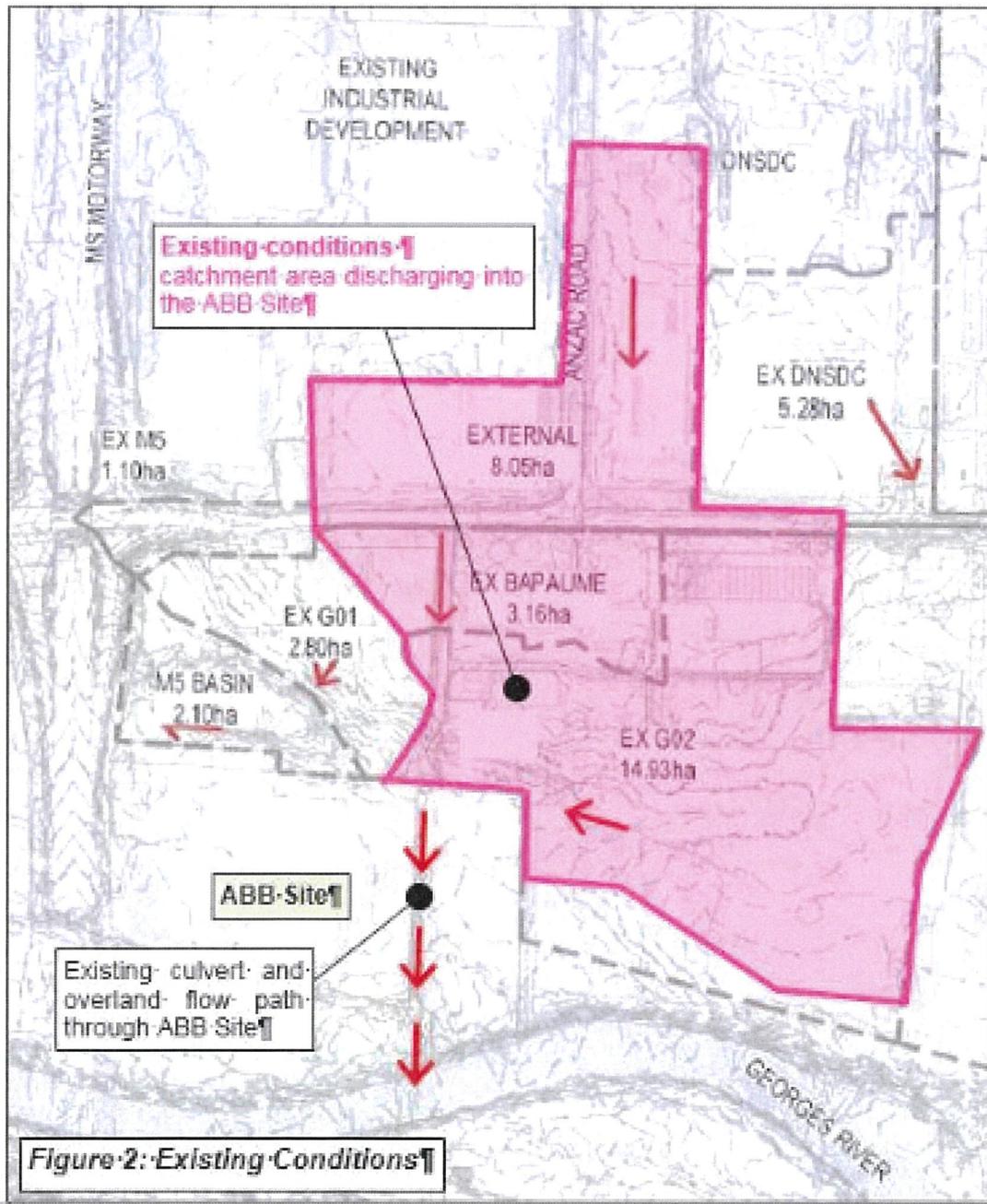
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There has been separate correspondence between SIMTA and ABB. ABB is endeavoring to work with SIMTA to understand and resolve these issues. However, given the amount of information and the complexity of the issues it is not possible to resolve them within the time frames for responses to the assessment process. Given the scale of the intermodal project, ABB does not anticipate that its concerns will be given sufficient weight to delay or prevent the approval of the project and so, in recognition of the inevitability of that process moving forward, we have set out in this letter the main issues, the further information that is required and a preliminary proposal as to conditions that might be considered to allow unresolved issues to be worked through following the approval of the Intermodal Project.

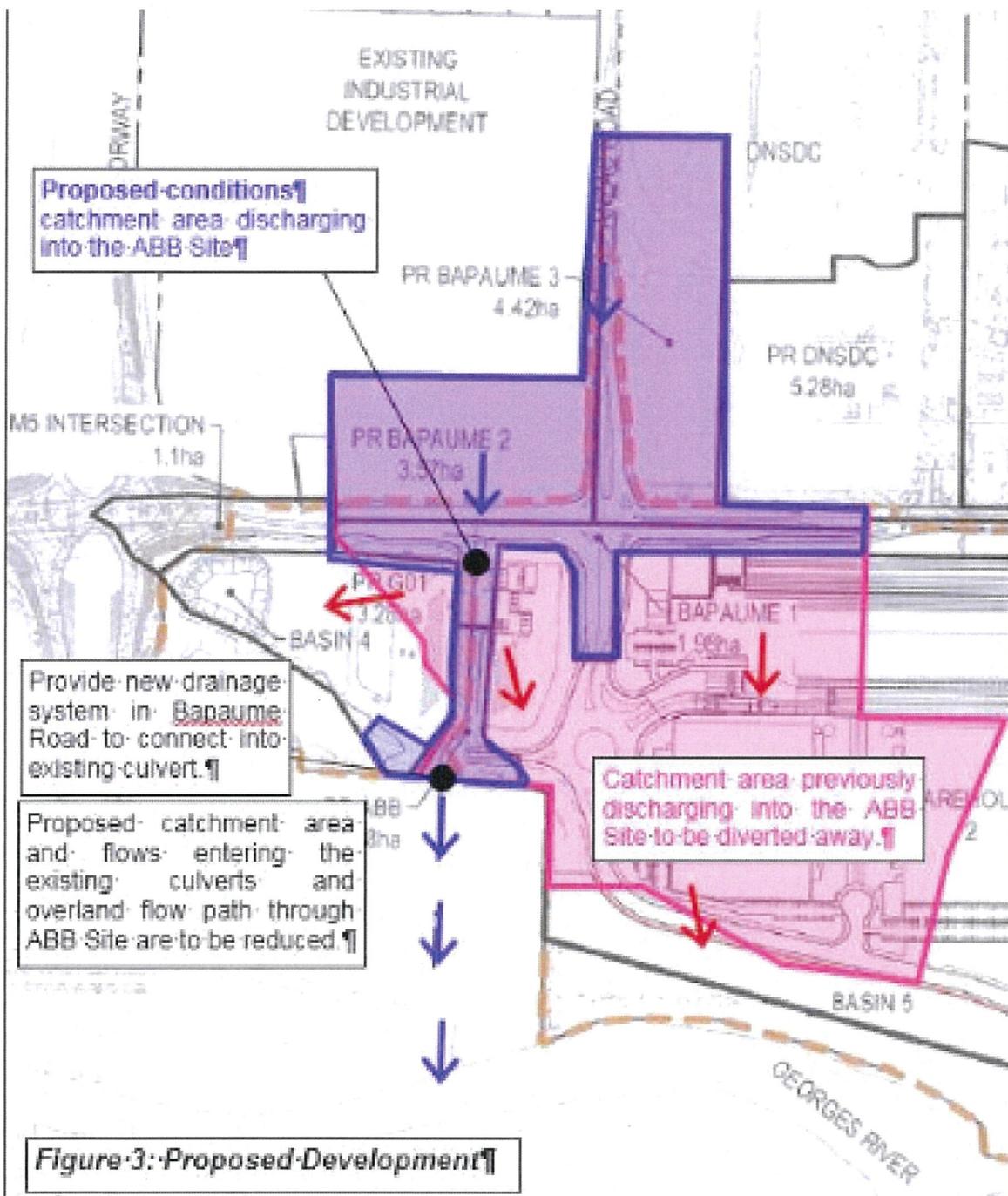
ABB will continue to work with SIMTA to continue to resolve these issues and will correspond further with the Department in that regard as the discussions progress. The issues that are raised in this letter are relevant to the assessment of the project and should be considered further by the Minister before approvals are granted.

Issues relating to drainage generally:

In a letter to ABB dated 8 November 2016, SIMTA have indicated that the current drainage arrangements for the land to the east and south of the ABB site are shown in the following diagram:



SIMTA says that the proposed drainage arrangements will be:



SIMTA says that the result will be as shown in the following table:



Discharge Location	Site Condition	Catchment Area (ha)	DRAINS Model Label	Flow (m ³ /s)		
				5yr ARI	100yr ARI	PMF
8 Georges River MPW Site South	Existing	11.17	F Outlet 8	1.2	2.3	19
	Proposed	18.45	F PR Outlet 8	0.5	0.9	27
6 Georges River MPW Site (6+8)*	Existing	55.30	F Outlet 6	9.3	16.5	88
	Proposed	85.24	F PR Outlet 6	2.3	5.3	110
5 Georges River MPW Site (MPE + 5+6+8)*	Existing	155.53	F Outlet 5	16.0	29.1	168
	Proposed	190.61	F PR Outlet 5	9.2	14.3	259
4a MPW Site (at ABB Eastern Site boundary)	Existing	26.14	F EX G02	4.2	7.6	44
	Proposed	10.65	F EX G02	3.0	4.6	21
4 Georges River MPW Site North (4+4a+5+6+8)*	Existing	184.47	F EX Georges	19.4	34.8	199
	Proposed	204.5	F PR Georges	11.7	18.5	277
10 Georges River Rail MPW Site	Existing	1.48	C EX RAIL	0.0	0.1	0.6
	Proposed	0.25	C PR RAIL	0.0	0.0	0.2
3a Anzac Creek MPW Site South-east Site Boundary	Existing	24.82	F EX A3 Total	1.0	2.1	14
	Proposed	11.77	F Anzac Cuvert	0.5	1.2	17

Table 3: Comparison of Existing Conditions and Proposed Development Peak Flow Estimates

ABB has a number of concerns that it is discussing with SIMTA these include:

- The accuracy of the representation and modeling of the current scenarios;
- The lack of assessment of the construction phase impacts;
- The accuracy of the modeled outcomes.
- The management of first flush arrangements
- The use of and methods of construction of the proposed drains within the ABB site.

ABB is still endeavouring to understand the drainage issues and impacts and needs the following additional information:

- What assessment has been conducted in respect of the existing drainage system (i.e the pipes and swale, within the ABB site to adequately convey the expected flows from the altered catchments to the east of the ABB site to the Georges River;
- What are the expected water levels in the OSD basin that are proposed in the NE corner of the catchment bounded by Bapaume Road, Moorebank Road, the M5 and the ABB Site;
- Is the existing pondage in the catchment to remain, and if so, what will be the expected water levels within the pondage;
- What is the nature of the subsoils in the abovementioned catchment;
- A new pipe drainage system is proposed along Bapaume Road to convey water from the altered catchments east of Moorebank Road to the ABB Site. What flows from the piped system will be designed to accommodate (i.e. 1:50 years, etc.) and how will excess flows be handled in more severe rain events?

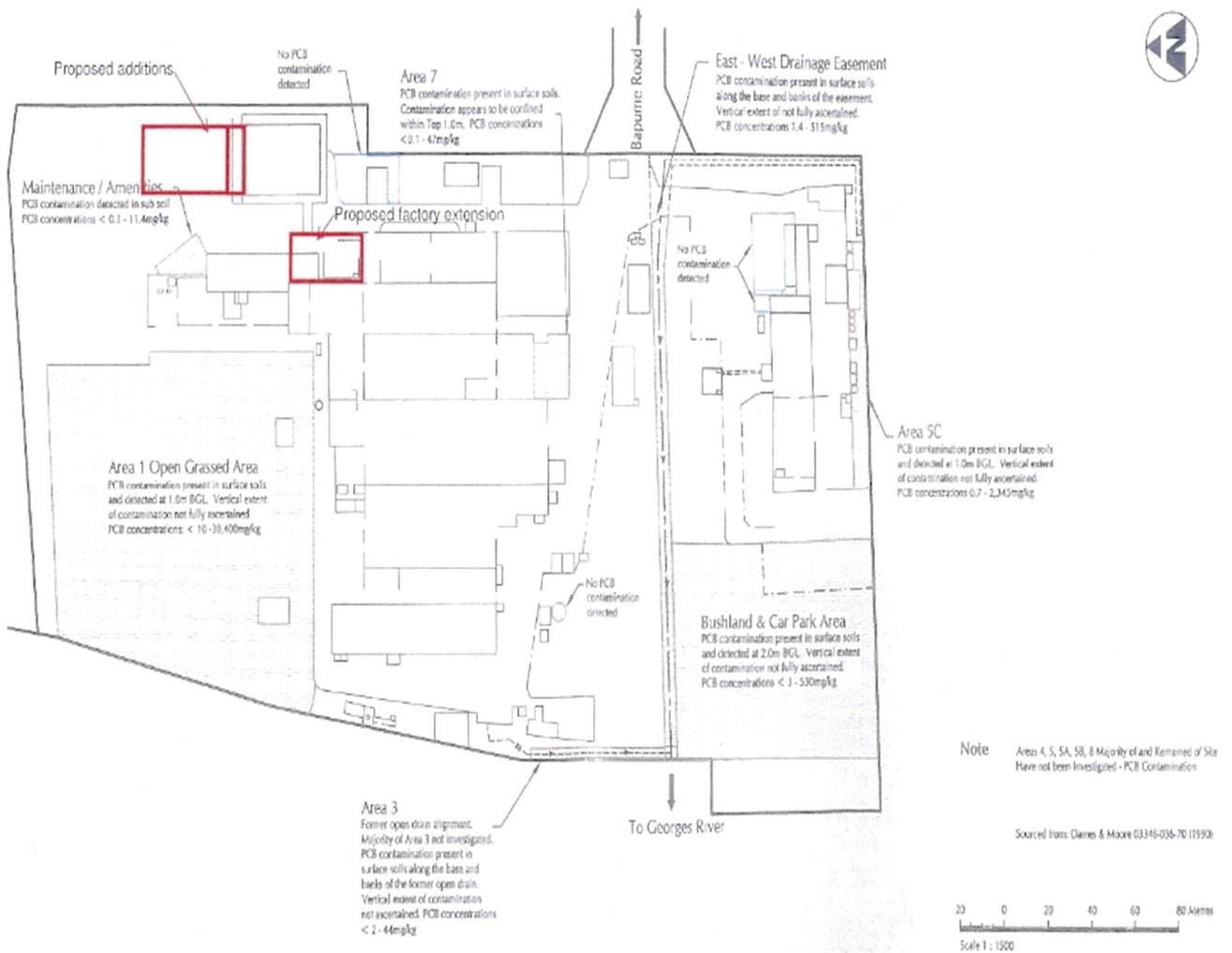
ABB is hopeful that it will be able to better understand and to resolve these issues in discussions with SIMTA but in the meantime any approval should:

- Not be issued until there is a complete assessment of the drainage arrangements and impacts for the construction phase and a validation of the drainage models for the both the construction and operational phases;
- Be subject to a condition that prior to commencement of works there be a drainage management plan that demonstrates to the satisfaction of the Minister that
 - Adequate arrangements have been agreed with ABB to manage the construction and use of the proposed drainage infrastructure within the ABB Site both during construction and operation phases of the project;
 - There is a documented legal right to use the ABB Site in the manner proposed during both construction and the operational phases of the Intermodal Project;
- Ensures that the outcomes set out in the [table above] are capable of being achieved and are achieved on an ongoing basis;
- Be subject to a condition that during the construction and operation of the Intermodal Project the drainage outcomes are consistent with or better than those specified [presently in the above table for the operational phase]

PCB's

The ABB Site has been managed pursuant to EPA orders for a number of years. One of the matters the subject of the EPA orders is the presence of PCB contamination in the vicinity of a former tank farm.

The following plan shows the approximate location of the PCB impacted groundwater in the vicinity of the former tank farm:



Areas of Known Soil Contamination (PCBs)



To date the assessment of drainage issues during both construction and operation phases of the Intermodal Project do not address the potential impacts of the Intermodal Project on the PCB contamination. ABB will work with SIMTA to provide necessary access and information to carry out that assessment. ABB is still endeavouring to understand the groundwater and surface water impacts and needs the following additional information:

- Provide justification, by drain model or similar, that both peak and base flow will not be increased in the drain. Please also confirm construction details for the drain which demonstrate that there will be no water infiltration into the ground or sediment migration in the backfill of the pipe;
- Confirm that no exacerbation will occur to increase the opportunity of overland flow compared to current conditions;
- Demonstrate that the proposed storm water retention basin will not increase the groundwater head at maximum height and long term duration of head compared to the existing conditions caused by the pond; and
- Demonstrate that the closest elevated earth works will not cause consolidation sediments which could adversely impact the underlying aquifer resulting in alteration in standing water level, groundwater velocity and direction.

In the meantime approval of the Intermodal Project should:

- Not be granted until there is an assessment of these matters for both the construction and operation phases;
- Be subject to a condition that requires that:
 - Prior to commencement of construction works in the vicinity of the ABB Site the proponent demonstrate to the satisfaction of the EPA that the proposed works and arrangements will not cause the PCB contamination to move or to flow to the council land to the west of the ABB Site or to the Georges river and will not exacerbate the risks to people or the environment from the PCB contamination;
 - Monitoring equipment be installed to enable the groundwater to be monitored to demonstrate that the project works have not impacted on the PCB contaminated groundwater;
 - If the works do impact the PCB contaminated groundwater that the proponent take steps to manage and mitigate that impact – including preventing the contamination moving to the Georges River.

Traffic

SIMTA has provided information in respect of traffic movements including construction of a new access road and round about to the south of Bapaume road as seen on in the following diagram:



ABB Site

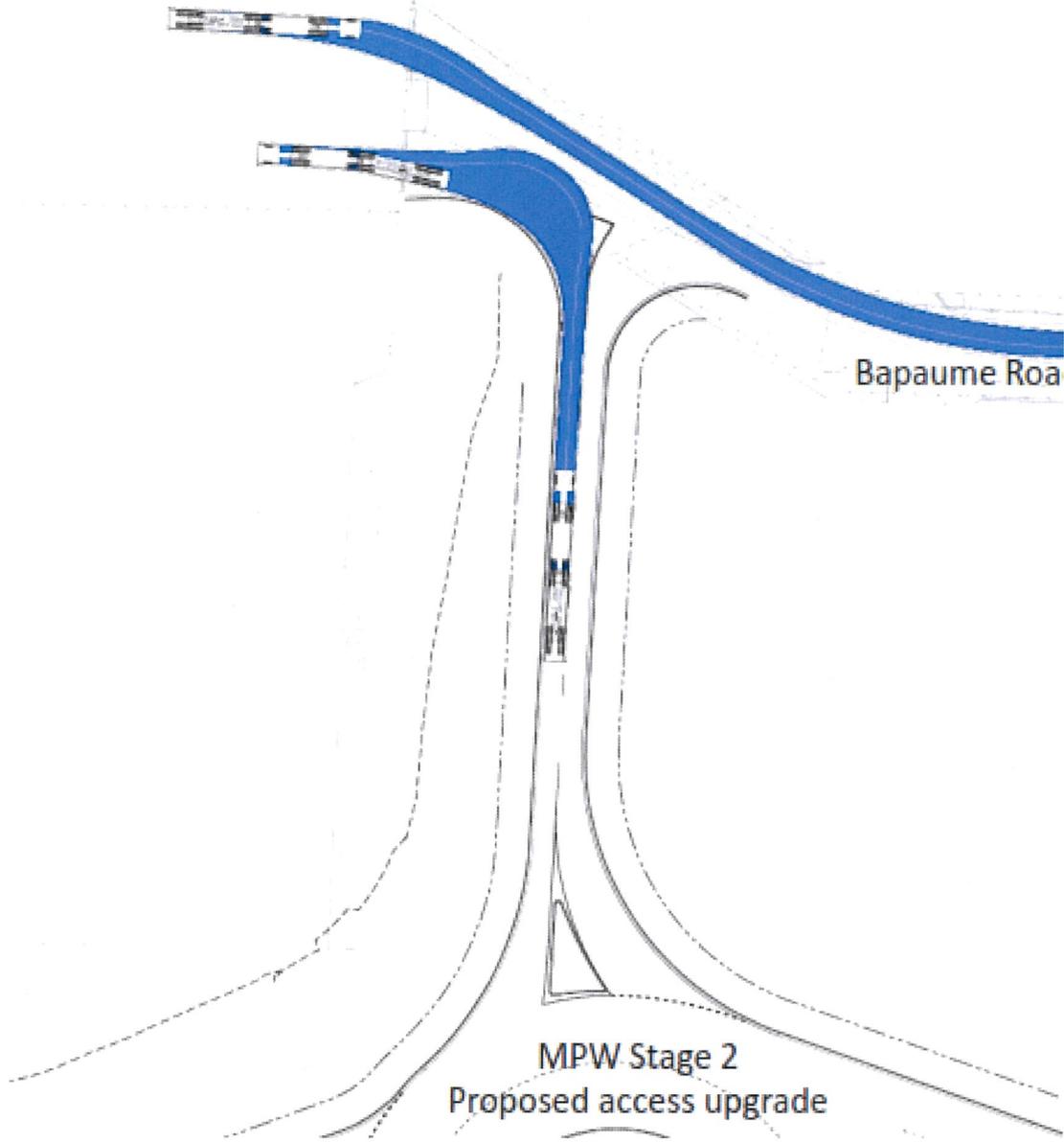


ABB has been provided with the following information as to the projected traffic volumes:



ID	Road Locations	2019 without the Proposal		2019 with the Proposal		Traffic Increase Contributed by the Proposal in 2019 Opening Year (% of Background Traffic)
		All vehicle	Heavy Vehicles (%)	All vehicle	Heavy Vehicles (%)	
M-1	Moorebank Avenue, north of Anzac Road	23,200	1,200 (5%)	27,040	2,700 (10%)	3,840 (16.6%)
M-2	Moorebank Avenue, south of Anzac Road	19,000	980 (5%)	19,080	980 (5%)	80 (0.4%)

Note: Traffic increase contributed by the Proposal equals to Proposal traffic generation divided by background traffic.

Table 2: Daily Traffic Volumes and Heavy Vehicle Volumes in 2029 (10 year horizon)

ID	Road Locations	2029 without the Proposal		2029 with the Proposal		Traffic Increase Contributed by the Proposal in 2029 Opening Year (% of Background Traffic)
		All vehicle	Heavy Vehicles (%)	All vehicle	Heavy Vehicles (%)	
M-1	Moorebank Avenue, north of Anzac Road	28,000	1,450 (5%)	31,840	2,910 (9%)	3,840 (13.7%)
M-2	Moorebank Avenue, south of Anzac Road	23,500	1,220 (5%)	23,580	1,220 (5%)	80 (0.3%)

Note: Traffic increase contributed by the Proposal equals to Proposal traffic generation divided by background traffic.

ABB is concerned as to the effects on its access arrangements with the increase in traffic during both construction and operational phases. ABB is still endeavouring to understand the traffic impacts and needs the following additional information:

Traffic Modelling

The proposed signalisation of Moorebank Avenue and Anzac Road is reliant on raised median being constructed upstream across Bapaume Road. This will result in the Bapaume Road intersection operating with a left-in and left-out arrangement.

Further information is therefore required to understand the specific effects on journeys originating to the ABB site from the north (including the M5 Motorway) and journeys destined to Moorebank Avenue, south of Anzac Road. Modelling outputs are requested for the following intersections:

- Intersection of Moorebank Avenue and Anzac Road,
- Internal roundabout intersection, and
- Intersection of Moorebank Avenue and Bapaume Road.

In addition to the overall Level of Service achieved for these intersections, the performance of each individual approach (delays and queue lengths) need to be made available in order to establish the additional journey times that ABB users will be subjected to over existing conditions. As a substantial proportion of SIMTRA traffic will comprise of heavy vehicles, it should be confirmed whether heavy vehicle percentages have been accounted for in the software modelling undertaken.

Truck Movements

Whilst overall heavy vehicle volumes have been published, we require more specific information as to:



- Confirmation of the maximum daily number of heavy vehicle traffic movements for the above three intersections, during both construction and operational phases.
- A schedule showing a breakdown of truck movements each hour. This should also include details of any organised 'platoon' of trucks departing the site.
- Routes for all SIMTA trucks accessing the arterial road network.
- Swept path analysis demonstrating all permissible movements at the above three intersections for the largest design vehicle (SIMTA or ABB).

We consider that Anzac Road should be the primary access for SIMTA and therefore we expect no development traffic to enter Bapaume Road. In this regard, mitigation measures will need to be outlined as to preventing/discouraging non-ABB traffic to access this road via the northern leg of the SIMTA roundabout. It should be noted that as right turns into/from Bapaume Road will be prohibited, these proposed measures should not impact on ABB trucks accessing the site via the roundabout.

Finally, the impacts of these truck movements on pedestrians should be examined. Pedestrians currently use Bapaume Road to enter the ABB site, and are accustomed to low traffic volumes. Notwithstanding providing details on all proposed pedestrian footpath/crossing treatments, sight distance assessments should be undertaken in accordance with relevant guidelines to ensure adequate visibility between trucks and pedestrians at all intersections and SIMTA site accesses. Road Safety Audits should be conducted to the satisfaction of Council or Roads and Maritime Services, if warranted.

Noise and dust

The assessment documents provide a high level assessment of the noise and dust that will be generated. The reports submitted as part of the EIS for the stage 2 Application indicates exceedance of the noise maximum levels for properties in the vicinity of the development but no testing has been conducted on the ABB Site.

Table 3-5 Predicted Construction Noise Levels During Standard Hours

Receiver	Predicted $L_{Aeq, 15min}$ Noise Level	NML	Exceedance
Casula	50	49	1 dB
Glenfield	36	45	-
Wattle Grove	37	45	-
S1	49	55	-
S2	48	55	-

Table 3-6 Predicted Construction Noise Levels During OOH Period 1

Receiver	Predicted $L_{Aeq, 15min}$ Noise Level	NML	Exceedance
Casula	39	44	-
Glenfield	26	40	-
Wattle Grove	26	40	-
S1	38	55	-
S2	47	55	-



Table 3-7 Predicted Construction Noise Levels During OOH Period 2, 3 and 4

Receiver	Predicted $L_{Aeq, 15min}$ Noise Level	NML	Exceedance
Casula	44	44	-
Glenfield	31	40	-
Wattle Grove	35	40	-
S1	44	55	-
S2	43	55	-

The EIS submissions also indicate there will be dust impacts but no assessment has been conducted on the ABB site.

ABB is still endeavouring to understand the noise and dust impacts and needs additional information regarding vehicle movements during the construction phase to understand the impacts during construction.

ABB is grateful for your consideration of these submissions in your assessment of the proposed development.

Kind regards,



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