



Melanie GIBBONS MP

Member for Holsworthy



12 April 2021

To Whom It May Concern,

Re: Objection to the Moorebank Avenue Realignment (SSI-10053)

I am perplexed at the volume of proposals approved for the Intermodal at Moorebank, especially with the detrimental impacts they may have. While the argument of the positive benefits it will bring to the local, state and federal economies should be considered – this should only be looked at secondary to the risk to the amenity and safety of our local environment and residents. I urge you to make sure this is considered above all when assessing this new application.

When I was notified that Qube Holdings Ltd had submitted an environmental impact statement [EIS] for the project to realign Moorebank Avenue around its intermodal site – I was confused.

Firstly, who has ownership of the road? Who will maintain the road if it is for the private use of this facility?

Secondly, this was an idea that was put forward many years ago – but was quickly taken away due to community concern.

It seems as if the Intermodal submissions say one thing and then a modification is put in later to add to the previous submission; to provide a better outcome for the Intermodal at the cost of the surrounding area and residents. How can we believe the submissions actually have merit – when it feels like we have been misled so many times in the past?

Construction of the Intermodal should not impact the lives of residents more than it is already expected. **If they had to redirect the road, then I wish they stuck to my, and many other members of the community's calls, and built it along the western side of the site.** This should be still considered for two major reasons – it keeps the road away from the back fences of Wattle Grove homes and allows for the Georges River foreshore to be given back to the local community, as other developments have done in recent years (this helps to protect the river and natural environment, and provides amenity for local residents). I have a recollection that this was a suggestion put forward initially but was removed when it became one large precinct.

One of the greatest impacts I can see for the surrounding residents, is the issue of sound pollution. Qube Holdings' road traffic noise industry criteria in its EIS states that the realignment of Moorebank Avenue will increase road traffic noise levels for residential areas to the east, but because it is the development of a new road "no additional mitigation measures are required". The noise report conducted by EMM states, at section 5.6, "the assessment has demonstrated noise levels are only 2-3 dB

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above the more stringent noise criteria for residential assessment locations.” I have concerns that this report is just focussing on what is projected and not on how much it varies from our current situation – it is over the criteria for sound (as they have stated) with a major increase from current noise levels.

At their testing locations, from their data, it can be shown that the following is predicted:

26 Brickendon Court, Wattle Grove					
Current Day* (dB - 15hr)	Projected Day** (dB - 15hr)	Day Change	Current Night* (dB - 9hr)	Projected Night** (dB - 9hr)	Night Change
40	51	27.50%	36	46	27.78%

25 Exford Court, Wattle Grove					
Current Day* (dB - 15hr)	Projected Day** (dB - 15hr)	Day Change	Current Night* (dB - 9hr)	Projected Night** (dB - 9hr)	Night Change
42	53	26.19%	38	47	23.68%

25 Yallum Court, Wattle Grove					
Current Day* (dB - 15hr)	Projected Day** (dB - 15hr)	Day Change	Current Night* (dB - 9hr)	Projected Night** (dB - 9hr)	Night Change
46	52	13.04%	42	44	4.76%

* Current data is taken from Tables A.1; A.2; and, A.3 from the EMM Noise Report

** Projected data is taken from Table 5.6 from the EMM Noise Report

As we can see, the residents in Wattle Grove will experience an increase in noise pollution from what they already have. **In some places these residents will have more than a 25% increase in sound during the day and unfortunately, during the night.** This will affect their amenity.

I believe - that if this project progresses - **Qube should be required to install a sound barrier all along the eastern edge of the Moorebank Avenue realignment to help the local residents retain their local amenity and noise levels they are accustomed.** If a sound barrier is good enough to protect the Defence land from additional noise – then it should be good enough for our local residents.

According to the consultancy, Safe Environments, a person can generally perceive a one to three decibel change in noise levels. The increase in energy experienced by the ears is doubled every three decibels. When it comes to the potential for noise induced hearing loss, it is the noise energy level that is critical.

Safe Work Australia states “ideally noise levels should be kept below 50 dB if the work requires high concentration or effortless conversation.” Yet we have three monitoring sites where the decibels are above this, which is not ideal for people who want to enjoy living in their own homes or those who work from home.

Standards Australia (2000) outline that design levels for a suburban house should be 35 dB maximum and that 30 dB is satisfactory. The neighbouring households will experience much greater levels than these.

Besides the distraction from the noise, long term exposure can also lead to hearing loss, which cannot be reversed and becomes a lifelong hindrance. It should be stressed that the proponent was aware of these risks and yet has chosen to not mitigate by moving

the road away from homes or providing barriers and so, I believe they may be opened up to the risk of litigation.

The issue of traffic is another concern. The current designs for the realignment would restrict access for their private use, forcing other road users to make four new turns to navigate around the site – creating a longer journey and potentially creating traffic (as turns often do).

Additionally, there is a great deal of concern within the community about local roads that will be severely impacted by this change.

To help combat these concerns, I would **recommend that weight/truck restrictions be investigated for Anzac Road and Nuwarra Road**. This would force these trucks to use Moorebank Avenue and the M5 (as it seems the Moorebank Intermodal intends) and will ensure that these roads are not used as rat runs to get to the Intermodal. **The installation of enforcement measures should also be investigated**. These roads are used by local residents on a daily basis and do not need the additional traffic that the Intermodal will put on them.

There are also concerns that have been raised with me about the condition of the natural environment should this proposal be approved. These include the condition of Anzac Creek – and the detrimental impacts that could occur to this waterway should the realignment be approved – and additionally, the potential for koala and other animal habitat to be destroyed, and lives risked, due to a road potentially running through it. Koala habitat has already been significantly reduced due to the clearing for the facility.

I finish by mentioning – as I have in multiple previous speeches and submissions – all upgrades to the surrounding road network that are to be completed to benefit the Moorebank Intermodal, should be at the cost of the Intermodal. No tax payer funds should go into helping prop up a business that the majority of my local residents do not want here, and that is likely to be detrimental to their quality of life.

Please feel to contact me should you wish for any further clarification.

Yours sincerely,



Melanie Gibbons MP
State Member for Holsworthy
Parliamentary Secretary for Families, Disability and Emergency Services