

# SIMTA EIS Response

There is a short phrase on page 88 of the EIS that clearly explains the problem that local residents have with this proposed development. It reads “The surrounding area does not have a desired future character”. In this respect the proponent could not be more wrong. The Liverpool area is a growing city, open for business, but more than anything a place people call home.

The proponent speaks and acts as if the impact of thousands of traffic movements a day and the imposition of an industrial wasteland on what is primarily a residential area is no significant thing, but it is to honest hard working residents who just want to enjoy their street and their backyard while they pay off their mortgage. They don't want their kids to get sick and they don't want their suburb and local environment degraded in any way. Not degraded “within acceptable levels”. They don't want “low level” impact on their sleep and health. They want to get on with their lives, to sleep at night and go to work refreshed in the morning and to spend time with their families kicking a ball in the backyard without choking on diesel fumes while the kids wheeze and reach for their puffers.

Liverpool Council supports these objectives and is pursuing a vision for the City of Liverpool that maximises opportunities for businesses while providing an enriching and livable city for residents. For that reason Liverpool Council supports the Badgerys Creek Airport proposal and is strongly encouraging the moving of the intermodal development to the vicinity of Badgerys Creek where there will be acres of warehousing and which is much more centrally located in the catchment identified by SIMTA. Any consideration of this development must be considered in the context of the wishes of the local community and the plans expressed by their elected representatives.

Having reviewed the EIS, I have the following comments for your consideration.

Since SIMTA has been appointed by the government to implement its MIC project, it is contrary to good planning to submit two separate EISs that are effectively for the same development. It divides the impact into two separate impacts which will nevertheless be cumulative.

It is unfair to produce two EIS documents for two parts of the same development (SIMTA and MIC) and release them simultaneously. Residents are only able to devote a limited time to reviewing the documents and the combined size, and the complexity of separately lodging the two EISs and the timing limits residents ability to protect their rights by responding in detail.

SIMTA still provides no promises of sound mitigation for its rail link. There is nothing but trees between the rail link (as it enters the site at the south end) and residents in the

southern part of Wattle Grove and SIMTA seeks approval to put many of these to the chainsaw to put the rail link in.

While SIMTA claims the development “Will assist with alleviating freight-related road congestion between Port Botany and Moorebank, particularly along the M5 Motorway”. The statement simply makes no sense. SIMTA will only provide capacity to increase output from Port Botany, rather than improving the movement of current capacity. MIC modelling shows containers put on the road at Moorebank would otherwise only travel through Moorebank in small numbers since the south west already has several IMTs and the primary destination for containers is Eastern Creek and further north. This is borne out by the SIMTA EIS figure 2-1 which very clearly shows a distant destination is the most probable with the majority of the catchment around the M4 or north of it as far away as Richmond.

The section ‘Consideration of other alternate IMT sites’ is superficial in the extreme. There are clearly alternative options that are significantly superior. The Moorebank location is a long way distant from the final destination of the containers. The impact on the roads is not properly considered and almost all of the expense of the road congestion caused by the terminal traffic is to be paid by the government. Liverpool Council has proposed a significantly superior location - Badgerys Creek. The airport location is actually ideal since it is a compatible land use to the airport and the necessity to build out infrastructure for the airport will allow the roads and rail necessary for an IMT to be developed in tandem with no need to retrofit. Further, the warehousing that is obviously going to be developed around the airport will actually need an IMT much more than residential areas of Wattle Grove and Casula.

While the proponent blandly states “The Proposal would operate 24 hours a day, 7 days a week.”, this is a very significant point. Since the proponent intends to ultimately operate a significantly higher capacity, it ought to be able to operate 250,000 TEUs in daylight hours only, thus minimising noise impacts to residents, without impacting its business.

The proposed rail corridor impacts valuable native vegetation. The recent agreement between the Federal Government and SIMTA regarding MIC enables a greater degree of cooperation and infrastructure sharing between the MIC and SIMTA components of the development and the proponent should be compelled to share its rail connection with MIC and not impact the native vegetation to the south of the SIMTA site. This area is recovering from previous land use and cannot support a rail corridor being carved through its middle and the consequent weed incursion and impact on native fauna.

The traffic and transport analysis artificially and deceptively minimises traffic impact by separating the MIC and SIMTA parts of the development into separate projects and separate EISs, even though they are being developed simultaneously, by the same organisation and in the same location. Discussion of the impact of MIC is limited to the development phase and excludes the operation.

The statement that air quality impacts from construction can be managed is not credible. Residents have recently endured the construction impacts from the new DNSDC facility and

residents experienced visible buildup of airborne material on surfaces and were compelled to inhale the same material. The same kind of measures as are proposed by SIMTA were taken by the DNSDC developer and were inadequate.

The air quality analysis artificially and deceptively minimises air quality impacts by separating the MIC and SIMTA parts of the development into separate projects and separate EISs, even though they are being developed simultaneously, by the same organisation and in the same location. Discussion of the impact of MIC is limited to the development phase and excludes the operation.

The noise and vibration analysis artificially and deceptively minimises impact by separating the MIC and SIMTA parts of the development into separate projects and separate EISs, even though they are being developed simultaneously, by the same organisation and in the same location. Discussion of the impact of MIC is limited to the development and excludes the operation.

The non-indigenous Heritage impacts are significant and unacceptable. The relationship between the military and the local area has been a significant element for over a century. The eradication of that heritage with no measures to minimise the loss is unthinkable. At least one of the WWII buildings, but preferably more, could be relocated and repurposed perhaps with adaptive reuse as administrative buildings on site.

The assurances in the “Visual Amenity, Urban Design and Landscape” section are unconvincing. Similar assurances were given for the new DNSDC development and residents are stuck with clearly visible structures, impacting the streetscape in areas as distant as Lakeside Park in Wattle Grove. Concrete promises are needed along the lines of “no aspect of the development will be visible from any residential area”.

The EIS makes a lot of affirmative statements, but offers nothing to enforce them, without which they will clearly be ignored a proportion of the time. These include:

- No trucks on Anzac Road
- No idling policy
- Rejecting smokey trucks
- Driver Training
- Stand down of equipment with smokey exhaust
- Track Lubrication

The proponent should be compelled to fund a council ranger position (full time and ongoing) to enforce these and other measures.

There are a number of other residents concerns that the proposal does not address and should:

- Pollution from aging locomotives
- Noise from locomotives travelling on the SSFL to the site further impacting Casula residents quality of life