

Application number: SSD 6766

Project name: Sydney Intermodal Terminal Alliance Project Stage 1

Objection to the SIMTA Intermodal Proposal

The development of an intermodal terminal at Moorebank will mean additional traffic on the already congested road network. 10,000 heavy vehicles per day will need to access and leave the terminal utilising the M5 and local roads. It would be a mistake to approve this proposal.

There is a notion that an additional intermodal is required to reduce supply chain costs; however, it is questioned how the proposal at Moorebank will assist in reducing these costs.

The proposed terminal in Moorebank will include transferring freight by rail less than 25 Kilometres from Port Botany, while increasing the handling costs of the supply chain with containers having to be loaded and unloaded multiple times in a very short distance.

Infrastructure NSW has also questioned the viability of short haul freight and the funding of additional intermodal facilities until this has been properly investigated. That being the case, the increase in capacity at Chullora should be investigated with proper planning for a true intermodal at Badgerys Creek. Jenny Wiggins, in her Sydney Morning Herald article, states that Asciano is primed to invest \$112 million to 'compete "vigorously" with its own intermodal terminals', for example Chullora, and challenge the Moorebank intermodal essentially casting doubts over the economic viability of the Moorebank site (Wiggins, J., 2014, 'Asciano challenges Moorebank freight hub', Sydney Morning Herald, 2 July 2014).

To truly reduce supply chain costs, the intermodal location should be moved to Badgerys Creek, a facility more than 40 Kilometres from the Port with access to key roads such as the

M7 and the proposed M9. This location will also have the capacity to support future growth centres. The M9 motorway will provide 'a direct link between the Central Coast and the Illawarra, connecting the growth centres of Camden, Penrith and Windsor' (O'Rourke, J., 2014, 'What Sydney needs to transport us to the future', Daily Telegraph, 3 November 2014). An intermodal at Badgerys Creek demonstrates good strategic and growth planning.

Why Badgerys Creek is a better location than Moorebank

Badgerys Creek is an ideal location for an intermodal terminal to handle both interstate and import-export freight. This is because it is:

- long enough for interstate freight trains without the need for trains to be broken up and shunted, creating unnecessary additional noise in the area;
- big enough to handle the number of container movements required – up to 1.1 million twenty foot Equivalent Units (TEUs) per year of import-export freight and another 500,000 TEUs per year of interstate freight. This is a greater capacity than the proposed Moorebank site;
- strategically located in an area where a new rail line is planned for the airport;
- near the M7 Motorway, a link to the West and North West where it has been identified by Deloitte that most of the container freight will be headed, and accessible to the M5;
- near the proposed M9 Motorway, providing the ability of the intermodal to service future growth centres;
- near the Western Sydney Employment Area (WSEA), future industrial areas and future freight markets in Western Sydney, where two-thirds of container freight received at Port Botany will be transported.

- further from Port Botany than the Moorebank site, making rail a viable alternative to trucks, and reducing supply chain costs;
- in development, meaning that truck access can be configured into the \$3.5 billion already allocated to the surrounding road infrastructure network rather than upgrading roads that are already at capacity in the Moorebank precinct; and
- owned by the Australian Government and available for use consistent with the airport.

Problems with the Moorebank proposal

The Moorebank site constrained by a number of issues:

- The area is already suffering from significant traffic congestion, the addition of an estimated 10,000 truck movements and approximately 5,000 passenger car movements per day will exacerbate this congestion.
- The Planning and Assessment Commission (PAC), following their community meeting on the SIMTA proposal, has identified that the Moorebank area is already suffering from significant traffic congestion. 'The community has strongly argued that the proposal is only going to move the congestion from Port Botany to the Liverpool/Campbelltown region. The Commission understands the Moorebank site is constrained by the surrounding residential and industrial land uses and the already heavily congested local and regional road network. If the concept plan were to be approved with the levels of throughput proposed by both SIMTA and MIC, then clearly the community's case is strengthened.' (2014, Planning and Assessment Commission, SIMTA assessment).

- The economic viability of the site has been questioned due to the limits placed by the PAC on the number of TEUs SIMTA can move through their terminal. Chief Executive of Asciano has also questioned the economic viability of the site as previously mentioned, stating that Asciano plan to invest \$112 million in their sites to increase capacity and making Chullora more competitive, able to handle an increased capacity from Port Botany, and open for operation before Moorebank (Wiggins, J., 2014, 'Asciano challenges Moorebank freight hub', Sydney Morning Herald, 2 July 2014). With the Chullora intermodal capacity increased to 800,000 TEU it will easily be able to support increased in freight through Port Botany while the Badgerys Creek site is planned and constructed.
- The Moorebank site is surrounded by water on all sides. This means that the complex road and rail upgrades needed to service an intermodal in this area will be extremely costly. Liverpool Council has estimated these upgrades are likely to cost in excess of \$750 million.
- There are significant problems relating to air quality, construction and operational noise impacts created by the intermodals. A proposal of this size and nature should not be earmarked for a residential area.
- The PAC determination of the SIMTA proposal has already revealed that Particulate Matter 2.5 levels in the local area are close to or above the advisory criteria for this pollutant, this applies to the current background levels as well as the predicted impacts. Additional diesel and liquid natural gas powered vehicles in this area will exacerbate this problem.
- Noise impacts, light spill and air pollution will have a detrimental effect on the local community, some of whom live as close as 400 metres from the site. Residents

around Port Botany living as far as three kilometres from the port are affected by these factors; many residents in Chifley for example have been very vocal about sleep disturbance in the online domain.

- The Moorebank site will have a detrimental impact on the Casula Powerhouse Arts Centre. The presence and accessibility of an art and cultural facility in a low socio-economic area, such as Liverpool, is essential for positive community growth.

Problems with the process

The Freight Infrastructure Advisory Board (FIAB) recommended a master plan for the site, this was not undertaken. Residents agree the SIMTA and MIC proposals should have been considered as a single precinct application. This has created an unfair advantage for the proponents with confusion being created among the community with both proponents presenting different figures. The fact that both proposals were assessed separately also means that media attention highlighting the different stages of the planning and assessment process has also created confusion in the community. Coupled with this, the relocation of the Defence National Storage Distribution Centre (DNSDC) and the current construction works at Holsworthy Barracks have also exacerbated this confusion with many people within the community thinking the proposal is already in its construction phase.

Liverpool Council, in meeting with PAC expressed disappointment that a master plan was not undertaken and confirms that this has created confusion within the community *'The ad hoc approachleaves gaps and inconsistencies in the information available resulting in a lack of transparency and reduced faith in government decision making.'*

A master plan would have reduced this confusion and allowed the community to better understand the impacts these proposals will have on their family, friends and neighbours. It

would have allowed the community to better refute claims made by the proponents, and have a much greater grasp of any proposed mitigation strategies for this proposal.