

Application Number: SSD 5066/EPBC 2011/6086

Project name: Moorebank Intermodal Environmental Impact Statement.

Name: Beverley Corben.

Address: 13 Woolmer's Court Wattle Grove 2173.

Phone: (02)9825 1173

Email: allancorben@bigpond.com

I oppose the Moorebank Intermodal Proposal and Environmental Impact Statement for the following reasons,

Proposed site: The idea of building an Intermodal terminal at Moorebank would have been an excellent idea 30 to 40 years ago, but not in 2014 as the proposed site is surrounded by many thousands of residential properties housing tens of thousands of people. Many of the homes are situated on land purchased from the Federal Government. The site is also surrounded by many schools, child care and aged care facilities.

Alternative Site: With Badgerys Creek airport coming on line, it makes sense to locate the intermodal at the same site. Badgerys Creek will require substantial road infrastructure to support the airport and the requirement for the Intermodal could be absorbed in that cost. At a MICL community meeting, the CEO Ian Hunt claimed that Badgerys Creek was too far away to be viable. Badgerys Creek is 29.4 km further south west from Moorebank with Badgerys Creek being only 21.9km from Eastern Creek which represents a large part of the area that most containers are destined for. Railing the TEU's to Badgerys Creek from Port Botany would increase the rail travel component by approximately 39kms. It would also reduce the road transport distance by approximately 7km. It should also be noted that Badgerys Creek site isn't located in the middle of residential development and doesn't have anywhere near the massive traffic congestion that is currently evident in Liverpool.

Rail line: The Port Botany freight lines have only a capacity in the vicinity of 480,000 TEU's P/A. MICL claim that two passing lanes on the current rail lines will rectify this restriction and increase the capacity to 1 million. My question is, is it possible to achieve the 1 million TEU's. I also question the massive cost that will be involved in the construction of two rail bridges that will need to be built over the Georges River to allow the Port Botany rail movements to enter the terminal. I would suggest not much change out of 1 billion dollars.

Terminal TEU's The SIMTA Concept plan has been approved on the basis that they are limited to 250k of TEU's + 250k subject to the ability of the road network to handle the volume of HV traffic. This being the case the same restriction should be applied to the MICL proposal. The same should also apply if the operations of SIMTA & MICL site are combined.

Rail viability: MICL claim that Moorebank is sufficiently far from Port Botany to make rail a viable alternative to trucks although it is on record that Infrastructure NSW recommended that state public funding for additional Intermodal terminal capacity in Sydney including in relation to supporting Moorebank and that infrastructure be minimized until there is greater clarity on whether the short haul rail freight market is viable. From my background in the industry, rail short haul viability has for many years been questionable. To locate the Intermodal to Badgerys Creek would increase the rail component of the freight movement by approximately 39kms with the possibility of improving the rail viability. It would also reduce the road cartage distance by approximately 8km.

Traffic: The proposed developments originally stated that the number of heavy vehicles coming into the area as 2600, now MICL are stating up to 8000 + by 2030. It's a fact that the Moorebank Ave/M5 south bound interchange is not suitable to handle the thousands of extra heavy vehicle movements per day. Heavy vehicles will not be able to accelerate up to the speed limit of 100 KPH to safely merge or weave with the through traffic due to the motorway being an uphill grade from the interchange to the Hume Hwy overpass. This has been acknowledged by the MICL CEO Ian Hunt. This interchange is an accident black spot waiting to happen. MICL clearly have no interest in the required road network upgrade, in fact, in their glossy brochure handed out at a community meeting they make a broad statement about several intersections but point out that the intersection of Moorebank Avenue and Bapaume Road to be unsatisfactory. No mention is made concerning the Moorebank Ave/M5 Motorway interchange which will be the most challenging upgrade, yet MICL just fob it off with comments like, quote, "Development of the terminal is likely to have a small impact on vehicle speeds on the M5 Motorway (west of Moorebank Ave), M7 Motorway, Hume Hwy and other roads near the terminal" These continual types of comments made by the proponents are nothing short of disgraceful and untrue.

Air Quality: PAC SIMTA determination has already shown that PM 2.5 levels in the local area are close to or above the advisory criteria, MICL state that, quote "Air quality monitoring has demonstrated that the concentration of different airborne pollutants in Liverpool is generally well below guidelines"

Which is correct, SIMTA or MICL?

The MICL graphs showing the background and predicted levels of PM2.5 and PM10 are also questionable. In the case of both study results the predicted increase appears to be very low considering

that there will be a minimum of an extra 39 additional train movements, 5700 car and 8160 diesel trucks movements coming into to the area per day + the many onsite operation equipment that will operate 24/7. It should be noted the proposed site is located in a basin which allows pollution to lie. It then has to rely on wind of some form to move it away. It should be noted that Liverpool area is one of the most polluted areas in Sydney.

Noise quality: Both SIMTA and MICL have acknowledged that mitigation will be required to control the noise levels so as to not exceed the guidelines, Residents in suburbs to Port Botany container terminal are currently experiencing sleep disturbance within a radius of 3kms of the terminal. It is considered that the same level of noise will be similar at Moorebank, yet MICL cannot advise as to how that noise will be mitigated other than to state that the mitigation process will be up to the successful company awarded the opportunity to construct and operate the terminal to address. In a recent reply I received from an executive of MICL the word mitigate or mitigation was used six times. It's easy to use the word, but ensuring that it happens is another thing.

Looking at the MICL noise study gives reason to question the accuracy of the data. An example is that receptor number R4 shows a dB(A) level of 47, yet a resident living in close proximity to the receptor has official documented evidence that he is currently receiving at his home a level of between 95 and 101 dB(A). This being the case, all other data must certainly be questionable.

Economics: Who pays for the massive upgrades to the 34 intersection including the Moorebank/M5 southbound interchange which I would suggest would run into to many millions of dollars if not billions in cost, two massive rail spur lines over the Georges River, again many millions of dollars.

Container destinations: MICL claim that the majority of TEU's would be delivered within a radius of 20km from the terminal, a study carried out by a modeling firm on behalf of our community showed that two thirds of all containers ex Port Botany are destined for the western suburbs not South Western Sydney which is between 26 to 35 km west of the proposed terminal.

Train Movements: MICL state that there will be 297 + train movements per week in and out of the proposed terminal. Many of these movements will occur during the nighttime and early morning resulting in sleep disturbance issues on surrounding residents.