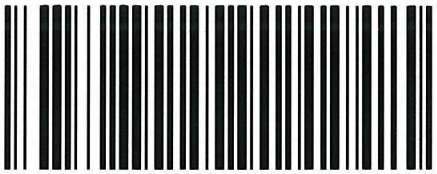

24th November 2014.

Submission on Reference: SSD 5066/EPBC 2011/6086 Provided by Allan Corben 13 Woolmer's Court Wattle Grove NSW 2173 P/N 0451 998 774 Email allancorben@bigpond.com

Opening statement

To validate the following comments I need to advise my employment history. During my working life I spent 47 years in the Transport & Logistics Industry. My role ranged from truck driver to senior management. 14 years of this period was spent in a container transport business located at Cooks River Rail NSW. During the period of my employment in the industry I have gained an excellent knowledge of the negatives aspects of all transport operations.

Submission is made up of copy paste content from the EIS in (Plain font***) and my comments in (Bold)***

Chapter 11 Traffic, transport & access.

Page 7 11.2.2 Rail and public transport network

The SSFL has been constructed between Sefton/Birrong and Macarthur and provides a dedicated freight line corridor between Port Botany and Macarthur. *What restrictions apply to rail the freight line from Chullora to Sefton/Birrong. Neither Sefton or Birrong are adjacent suburbs to Chullora.*

Page 25 Table 11.9 Summary of total AM and PM peak hour traffic movements. ***Numbers of car and truck movements, in & out of the terminal at peak hours are questionable. AM peak will see many heavy vehicles arriving and departing the terminal at that time of day. It is in fact, the start of their day. PM peak will be likewise as truck are returning to the terminal to drop of M/T TEU's and or reload for the next morning.***

11.4.2 Traffic distribution (operation)

Page 25 Road network distribution (operation)

As noted in Chapter 3 – Strategic context and need for the Project (section 3.6.2), Transport for NSW(TfNSW) is seeking to provide road network upgrades to support development of the Project. This should assist in minimising the operational traffic and transport impacts of the Project on the surrounding road network. ***What cost will be involved in this development? The developer should pick up this cost.***

Pages 30 & 31 Figure 11.7 & 11.8 AM & PM road network traffic volumes generated***, shows virtually no increase in vehicle movements AM or PM at the Moorebank Ave/M5 interchange east or westbound regardless of the fact that the Intermodal will bring the equivalent of the following cars into this intersection daily, 2023 = 17,597, 2028 = 20,878 & 2030 = 30,204 It is a well-known fact that this intersection is the worst traffic impacted intersection. This prediction is very questionable.***

Page 34 Figures 11.10 and 11.11 present a breakdown of the Project generated traffic by functional purpose, for both the AM and PM peaks for all years between 2015 (Early Works) and 2030 (Full Build).

These figures demonstrate the transition in Project related traffic movements throughout construction and operation. ***Both graphs that relate to the above show that the IMEX & Warehouse heavy vehicle traffic volumes will be less in 2028 than the previous construction phase in 2023. I would think that volumes would be higher in 2028 as the development heads towards it predicted peek relative to the data mentioned in figure 11.7 & 11.8 above.***

Page 35 11.4.3 Traffic and access impacts (road network)

Page 35 The scenario for Phase A assumes Moorebank Avenue is fully upgraded in 2016. Before this, and during the early development of the Project, the points of access to the Project site would vary with the changing requirements of the Project. However, it is likely that the current intersections between Moorebank Avenue and Bapaume Road, Anzac Road and the DNSDC access would be the last intersections to be upgraded. To assess the traffic impacts on Moorebank Avenue before its complete upgrade, these intersections were analysed in their current (2014) state and in their projected state during the Early Works phase in 2015.***The above statement includes reference to Moorebank Avenue and Anzac & Bapaume Road intersections that would be the last to be upgraded. If this is the case and Moorebank Avenue is upgrade to two lanes each way would result in the Bapaume & Anzac road intersection becoming an absolute bottleneck during the PM traffic movement due to the remainder of Moorebank Avenue being one lane each way. If anything, these two intersections should be the first to be upgraded considering that they are currently assessed at Los F.***

It should also be noted that none of the upgrades in the length of Moorebank will improve traffic till such time that the Moorebank Ave/M5 Interchange upgrade is carried out. Who will be responsible for the cost as its obvious the developers not interested? This will be the case with all road upgrades beyond the northern end of Moorebank Ave. A traffic study carried out on behalf of the local community by a professional traffic Modeler has shown that in fact 35 Liverpool road intersections will require substantial upgrades to cope with the massive increase in traffic. This again raises the question of who is going to pay for these upgrades.

Impact on the M5 Motorway

Page 40 As shown in Table 11.11, 86% of heavy vehicles from the Project (IMEX and interstate facilities in particular) would travel along the M5 Motorway, en route to their destination. ***Due to the high cost of heavy vehicles using the M5 Motorway, drivers will rat run using the likes of Moorebank Avenue (North) Newbridge, Nuwarra, Heathcote Roads and the Hume Highway. Again another smoke and mirrors statement***

Table 11.14 shows that the percentage increase from the traffic generated by Moorebank IMT on the M5 is under 3% of total M5 traffic during the 2030 AM and PM peak hours. In Phase B there is a temporary increase due to construction traffic, but the extra traffic still represents less than 3% of the forecast M5 traffic volume. Similar increases are shown in Phase C. The increase in the heavy vehicle proportion is an overestimate as no allowance has been made for heavy vehicles that would have been on the network anyway. The impact of this increase in heavy vehicles is reflected in the intersection analysis. ***I again question the above statement due to the 2030 PCU's stated as 30,304 vehicles per day with a great deal of these movements being onto the M5 network.***

Page 41 Table 11.15 shows that, with the Project fully operational in 2030, there would be minimal changes to the AM and PM performance of the intersections. This table also shows that in order to

accommodate the future traffic (with or without the Project), additional capacity would be required at all of the intersections in the vicinity of the proposed development, excluding the Moorebank Avenue-M5 Motorway interchange. The results indicate that the intersections would operate with long delays for at least one of the peak periods. ***The M5/Moorebank Ave interchange will be the most important upgrade required. Not only is the intersection already a bottleneck at peak hours, but south bound heavy vehicles will not be able to accelerate to the speed of 100 kph to allow them to merge or weave with the background traffic due to a substantial uphill climb prior to the Hume Hwy overpass. Again I refer to the 2030 predicted PCU,s of 30,304 vehicles per day with delays at mentioned intersections increasing by 2 to 10 seconds when the terminal is at full operation. It's obvious that this prediction was arrived at by using the previous statement (page 40) that 86% of heavy vehicles will use the M5 Motorway to travel to their end destination. IE Not including heavy vehicles in the movement count.***

Page 42 Table 11.16

The interchange of Moorebank Avenue and the M5 Motorway would perform satisfactorily, maintaining a LoS C or better performance during the AM and PM peak hours in 2030. However, the DoS of 0.99 during the AM peak hour indicate that the interchange would be operating at capacity. ***This statement is highly questionable. This intersection is currently at capacity in the PM movements. Moorebank Ave/M5 interchanges needs to be well and truly upgraded prior to any operations commencing.***

Wider road network volumes

Page 45 The M5 Motorway in the vicinity of Moorebank Avenue is an existing congestion point within the motorway network. Congestion is forecast to increase with the widening of the M5 Motorway, as there are no plans to mitigate the congestion caused by the weaving movement between Moorebank Avenue and the Hume Highway. This may mean that the full benefits of the M5 Motorway widening scheme are not realised. Should congestion on the adjacent motorway network continue to be an issue, then the operator of the Project could consider scheduling more movements to occur outside peak periods when congestion is less likely to occur on the M5 Motorway. This will be further assessed as a part of future project approval stages. ***This statement alone supports the fact that Moorebank is the wrong location for the Intermodal particularly for economic reason.***

Page 50 11.6 Summary of key findings

During the construction of Phase A (in approximately 2016), Moorebank Avenue would be upgraded from a two lane, two-way road to a four-lane divided roadway between the East Hills RailLine and the M5 Motorway. New intersections along Moorebank Avenue are proposed to provide access to the IMT site. ***Throughout this report, far too many comments are made about upgrading Moorebank Ave and little else in the way of other absolutely required upgrades on many other roads/intersections and as such I have great concern as to the overall cost of the road upgrades.***

Page 51 Importantly, truck movements from the IMEX and interstate operations are not new trips. Without the Project, these movements would be associated with trips taken to and from Port Botany and, therefore, would already be on the highway network. ***The truck movements may not be new in what the proponent refers to as regional network, but it is fact that they are new trips on an already heavily congested Liverpool road network.***

Page 52 There would be no need for heavy vehicle parking on Moorebank Avenue associated with the Project. ***I find this statement of interest. Looking at the MICL facility plan, little off street parking has been allowed for on the site. They do have an area called "trouble truck parking" which very small. The problems associated with truck parking at Port Botany are well known where it was seen that Foreshore Drive Mascot/Botany was used as a truck parking area 24/7. Off street parking at Moorebank needs to be addressed before any operation is commenced.***

Non EIS comment. At the recent community meetings held by MICL, two residents had on separate occasions had a discussion with A senior person from MICL in which they both asked him "how many trucks will be using the M5 from Botany to Moorebank if the terminal is approved" The persons answer was to say that, "the same number of container trucks will use the M5 from Botany to Moorebank as now, there will be no reduction" His reason for this was that the MICL Intermodal terminal will only handle the expected future increase in containers coming into Botany, not the current volume.

The above issue needs to be investigated as the major justification being pushed for the past 6 years by both the political parties was that by building the Moorebenk facility it would take between 2500 & 3000 trucks of the M5 between Port Botany and Moorebank each day. We the residents have on many occasions had reason to not believe the proponents behavior in respect to honesty.

My closing comment on Chapter 11 Traffic, Transport & Access is that we the people who live in the suburbs surrounding the proposed Intermodal terminals know only too well how bad the traffic congestion is in the Liverpool area, because we live here and have to contend with this nightmare every time we leave our homes and as such I must say that I have no idea as to where the proponents acquire their data from.