

Public Response from Michael Russell regarding the “Referral of proposed action” for “Project Title Moorebank Intermodal Terminal (IMT) Project-Concept” supplied to the NSW Government on the 19th August 2011.

Below are listed some issues which I wish to raise and suggest need to be answered before consideration can be given to issue an approval for the applicant.

Summary. Reference Number 2011/6086

In relation to the Referral of proposed action (details as above) I believe that major discrepancies have been made in the proposal.

Alternatives, public consultation and omission of details have produced a flawed proposed application.

Listed below in sections are alternative responses which would give more insight to produce a balanced approach to the proposed project and the approval process.

The lack of alternative sites shows a one shot attitude which may be the best solution for a non government entity, not necessarily the NSW community.

The Federal Government may have delivered millions of dollars into the study of this IMT project, it may not be the most suitable. The Federal Gov. must be encouraged to explore other sites to produce a balance and justifiable solution.

The NSW State Gov has the best chance to ensure a best solution for NSW, not other entities.

Observations.

Section 1.1 Short Description

This section mentions that the proposed development land could possible be sold or long term leased to a non-commonwealth entity. If sold or long term lease the non-commonwealth entity may do whatever they wish to the site and not what this Government is proposing. Therefore the decision must be made before any environment approval is given because it cannot be guaranteed what industrial activities the land will be used for.

Section 1.2 Latitude and Longitude

The property details do not include description of areas owned by other parties which if necessary must be compulsory acquired as listed in section 1.3.

Section 1.3 Locality & Property Description

Fig 2 fails to show area of land which must be compulsory acquired for this IMT project to proceed. No description of the other lands area is described nor is there an environmental report of this other land.

The portion of land required for this IMT project to proceed is community land to be used by the Liverpool community as recreation land. It is heavily surrounded by residential homes which are already under pressure from freight rail services. Noise disturbing sleep for children affects their learning habits and causes fatigue and depression among adults. Despite many government surveys (ARTC 2010 and Railcorp 2011) showing that the levels exceed government guidelines and recommended safe health levels, no solution has been initiated to resolve the concerns of the local community that the excessive noise levels will be controlled to a reasonable safe level.

Section 1.8 Time Frame.

Note Comment “ The development of the Moorebank IMT site would be undertaken progressively in line with freight requirements” This comment suggest that construction work may commence and be ongoing for the next unknown number of years, continuously for many years. This would be ongoing construction noise and dust elements. When would the local community be free of construction.

220ha could be under construction of 10ha each year for 22 years.

Section 1.9 Alternatives to proposed action

This section has been ticked in the affirmative indicating that feasible alternatives have been considered and that section 2.2 is to be completed. The existing Chullora Trackfast site has not been mentioned as a considered resource. The Trackfast site already has access to the SSFL and better road access via the M4, M5, Hume Highway, Parramatta Road, Joseph St, Roberts Road and Centenary Drive and is situated almost in the heart of Sydney and the container industrial areas. Existing NSW Gov. railyard buildings and facilities are life expired and the area has the potential to be expanded. Situated next to the Enfield Intermodal and Cosgrove road makes this area an unique opportunity to upgrade a time expired resource into a much better national rail asset. Moorebank has been the suggest site due to the proposal of the SIMTA site requiring the Moorebank site to become operation so it can be established. It has the advantage of being able to access not only the SSFL line but the major railway lines to outer western Sydney, Parramatta and Penrith regions.

Section 1.13 Related actions/proposals.

“ Is the related action related to other actions or proposals in the region (if known)”
The proposer of this IMT proposal has indicted in the negative that no known similar or related proposals are related to this proposal.

It has been advertised for some time by the privately owned and operated SIMTA consortium of companies that they intend to construct a similar intermodal on the opposite side of the shared Moorebank Ave access road. In fact SIMTA has been in discussions with the IMT as they require rail access via the IMT site. In fact SIMTA require the IMT site to proceed so that it can gain access to the freight rail network. Without the rail link SIMTA cannot proceed.

Because this information has been withheld, this Referral of Proposed Action should be denied because of its misleading information.

Section 2 Detailed description of proposed action

Firstly the residents and local community have been advised by MPO that the rail link to this area would be from the Glenfield area. Well away from residential properties at Casula. This section describes the rail link being constructed over the Georges river through a known floodplain. The rail-link would destroy the plans of Liverpool Council and residents beliefs that the former golf course would become a community recreation area, taking the Georges River and Liverpool community back to its former glorious “ city by the river “ reputation. LCC has already started this project new a new wharf recently completed and new access road to the Casula Powerhouse Arts Centre refurbishment costing the community some \$30mil.

This new rail link in the middle of the Casula links would destroy the local community because of the 24/7 noise being generated by freight trains negotiating the access rail link curve into the IMT facility. The noise generated by a freight train travelling along a curve generates extreme noise of grinding screaming steel, continuously while being traversed by the freight train.

Again the community has been advised by the MPO that this IMT was for the transport of freight containers from Port Botany to Moorebank for dispersion of container goods by road to local industry. At no time have the community been advised that it was to be used as a staging point to transfer containers from Port Botany to either Melbourne or Perth.

The residents feel that the MPO has deceived the local community by its advice concerning these issues.

2.6 Public Consultation

The MPO office has failed to advise the community that one intention of this facility is to encourage shipping agents to use Port Botany as the drop of point for container transport to other interstate destinations. The MPO office informed that the purpose of the IMT facility was to transport freight containers by rail from Port Botany there by removing trucks from the M5. The MPO advised that the freight rail link was to be from the Glenfield area. It has not made knowledge of the crossing of the Georges river by two raised rail bridges in the middle of the Casula links community to gain access to the SSFL

2.7 A staged development is a component of a larger action

This referral fails to advise that the SIMTA consortium intermodal project would be unable to proceed unless this IMT project proceeds.

The last paragraph suggest that the proposed action will be designed to work within current infrastructure limitations, and would have the capacity to be upgraded should these offsite limitations be addressed. Is this response suggesting that the current road network will be able to accommodate this proposal and the increase of 1million truck movements per years on the currently congested M5 motorway.

Section 3 Description of Environmental & likely Impacts

The response by the proposer mentions the possibility of direct impacts but no the indirect prospects. i.e. the roosting and feeding habits of the grey-headed flying fox or the Regent honeyeater. With the large colony of flying-fox loosing possibly 220ha of food and rest vegetation, what would the future of the colony.

3.1 (g) Commonwealth Land

Description.

Proposed Rail link discusses one rail bridge (possibly two) over the Georges river on LCC community land currently being developed as a recreation area and main access route to the Casula Powerhouse Arts Centre. MPO has failed to advise the community of this design and this is a significant part of the operation of the IMT.

Possible fuel and chemical spills, flood and disruption to flow of Georges River flood plan have not been discussed or addressed.

3.1© Wetlands of International Importance

Nature and extent of likely impact. This section fails to address the possible impact of chemical or fuel spills into the Georges River and into the sensitive Towra Point Nature Reserve, nor the possibility of flooding from the Georges River into the IMT site.

3.3 (h) Commonwealth Heritage Places or other places recognised as having Heritage values

Proposer recognises adjacent private land SIMTA but earlier in Section 1.13 failed to acknowledge this as a related action proposer of significant similar project.

Section 4 Avoidance of Impacts- Design development

Design to minimise noise impacts on existing and future surrounding communities. The proposal is for an industrial railway/ truck transport area, operating 24/7, which would have a huge noise impact on existing and future communities. Having this facility operating in the middle of a community should not be allowed. Existing industrial areas should be considered and studied prior to approval for this facility to proceed.

Section 6.1

“Does the party taking the action have a satisfactory record of environmental management?” The respondent fails to advise that the possible selling or long term lease to a non-government party, May or May Not have a satisfactory record, that if sold/lease the proposer has no knowledge or control over the future environment management of the IMT site which could result in fuel or chemical spills into the Georges River and all river/marine areas between Moorebank and Botany Bay.

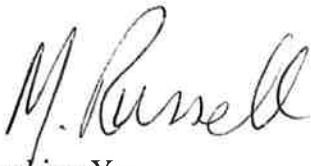
7.2 Reliability and date of Information

point 3 how the reliability of the information was tested ?? Unable to find appendix A

Section 7.3 Attachments

Table on page 26/28 section 2.5, 2.6 sections 3-4 and section 3 have no actions of attachments being provided.

If relevant attach, section --technical reports and -- reports on public consultation undertaken have been omitted.

A handwritten signature in black ink, appearing to read 'M. Russell', is positioned above the typed name.

Thanking You
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