

MICL EIS Submission

Andrew McDonald, resident of Wattle Grove

I submit that planning approval for the proposed MICL development should be refused.

I am a resident of Wattle Grove and my family and I live less than 1000m from the MICL site. I believe that this proposed development is an easy approach to solving a complex problem but that it is the wrong approach. The proponent proposes this terminal to fix an urgent need by the only feasible approach. I think their analysis of the situation is completely wrong.

To give this project the green light against the wishes of the local residents and their elected representatives, you would need to satisfy yourself on three critical questions. Will it fix the problem? Is the problem urgent? Is this the only feasible approach?

Will it fix the problem?

I believe this approach will not fix the problem. I think this proposal will most likely exacerbate the current problems around intermodal transport in Sydney.

The current situation at Port Botany is not good. There are a large number of trucks needed to service a growing number of container ships. The whole operation is causing traffic problems and a nuisance to Botany residents due to both traffic and noise. The impacts caused by consolidating all port freight at Botany should not be repeated at Moorebank.

Clearly the demand for containerised transport is growing. The Federal government has recently inked trade agreements with the US, Japan, Korea and China. There is a need to cater for this situation properly, however this proposal does not deal with the problems. It gets a proportion of containerised freight away from the Port without putting it on the road, but it cannot deliver that freight to its destination since the Moorebank site is so far from the target locations that MICL has identified.

Far from fixing the problem, it will make the situation worse. Any truck transport capacity relieved at Port Botany will be re-absorbed by growing container numbers.

The currently congested roads in Sydney's South-West and specifically in Liverpool will be made even worse, without solving the problem. Instead of being freighted 57KM from Port Botany, containers will be freighted 34KM from Moorebank.

Clearly this does not solve the road freight problem.

Further, the size of the site is only just large enough to accommodate the length of current

freight trains. With productivity improvements, and the growth of rail transport, intermodal trains are getting progressively longer. Building an Intermodal Terminal with Interstate operations with a size limited to current needs will prevent future improvements in rail productivity, seriously harming the national economy.

Is the problem urgent?

The situation at Port Botany is bad and needs to be fixed, but in a city as large and complex as Sydney this demands careful planning not a rush to implement whatever seems easiest.

There is no urgent need to build a terminal at Moorebank. Due to economic conditions, the growth in container traffic has slowed and Asciano has indicated that it can grow the capacity at Chullora up to 800,000 TEUs. Further, 250,000 TEUs have been approved for the SIMTA site, which was judged by the PAC to be sufficient for the current container demand in the region.

Since there are two sources of additional capacity in the South-West region, there should be no need to urgently increase capacity by building a new Terminal on the MICL site.

Is this the only feasible approach?

Clearly there are a number alternative approaches that would better meet the needs of the industry.

Building an Intermodal Terminal close to the container destinations identified by MICL (eg at Eastern Creek) would significantly reduce road freight and would be much more financially viable as it would reduce the road freight cost to near zero, making the facility very attractive to its customers.

Since a new airport is to be built at Badgery's Creek, there will be a lot of land locked up for industrial at that location. This would allow a much more extensive facility with room to grow, surrounded by its customers in very close proximity. As it would be a true greenfield site, there would be an opportunity to build its infrastructure from scratch, along with the infrastructure needed for the airport with no costly retrofitting, no road crews working at night, no speed restrictions or any other kind of disruption.

Since this proposal is not a good fix to the problems, is not urgent and is not the best approach, it should not be approved. My detailed concerns about the proposal follow.

The Planning is deeply flawed

MICL's analysis shows that there is only very modest need for additional capacity locally, and that the main target for containers that would come to Moorebank are 30KM or more

away to the north or north-west. This was clearly shown at the public information session with a diagram showing container demand for MICL's containers as circles on a map.

While the site seems very large, the site is only barely long enough for current requirements of interstate freight rail. The design incorporates a large loop for the trains since they don't properly fit into the site. This facility would have the effect of preventing future efficiency improvements in interstate rail transport by limiting future train lengths.

The MICL site is surrounded by residential areas. Casula is only a few meters away on the western side. Wattle Grove is less than 1KM on the eastern side. A portion of Moorebank residential is on the northern side. Glenfield is very close to the South West. There are residents in almost every direction but very little warehousing in the local area. The appropriate site for an Intermodal Terminal would have very large areas of warehousing to take the containers it supplies.

The MICL site is prime riverfront land and is objectively more suitable for residential or commercial development. Analysis by Western Sydney Parklands revealed "Market demand analysis has determined a shortage in business/retail floorspace within the region" (reference Liverpool City Champion 5/11/2014 p4 advertisement).

The MICL site is very close to the employment centre and retail hub of Liverpool. These features will be of no benefit to the container terminal, but would be a significant benefit for other land uses.

The proposed terminal is not suitable for the site and there are better uses for site. The only compelling argument for building the terminal at Moorebank is that it is close to the new SSFL, but there are many suitable locations close to freight rail capacity, so this benefit is far from a sufficient reason to build on a block of land that is unsuitable due to its size, distance from its projected customers and proximity to fragile natural environment and extensive residential areas.

Finally, there is no whole-of-precinct plan. The cumulative impacts of the two proposals have not been adequately explained or addressed by the proposals. Since the PAC has already approved a sufficient number of containers for the demands of the region in response to the SIMTA EIS, no further capacity is required at present and none should be approved without a comprehensive cumulative impact assessment for both proposals and the road and rail transport required, covering all regional roads, and local noise and air quality. It is simply not acceptable to short change residents by not considering all related impacts as a whole.

Badgery's Creek is a better plan

Badgery's Creek has been proposed by Liverpool Council as a preferable alternative to Moorebank for an Intermodal Terminal.

Badgerys Creek is further from the centre of Sydney than Moorebank is. In terms of its

value as residential land, Badgery's Creek is very distant from existing employment centres and therefore is unattractive for dense residential. The MICL site, being adjacent to two different train lines and having views of the beautiful Georges River is a prime location for residential development. In addition Badgery's Creek land is less valuable, so it is actually preferable for developing an Intermodal Terminal which needs a lot of land.

The distance from Badgery's Creek to the container destinations identified by MICL is about the same as the distance from Moorebank, so in that sense it is equally viable, however Badgery's Creek has a lot of land suitable for Industrial redevelopment, so as a terminal located there attracted businesses which need its containers there would be plentiful cheap land to accommodate them, unlike Moorebank which has no available undeveloped land nearby.

Since there is to be an airport at Badgery's Creek, noise from the airport will lock up a lot of land for industrial use, as it will be unsuitable for housing. This means that even without the pull factor of a terminal located there the area would still be a major destination for containers. It makes sense to play into this trend, rather than working against it.

Badgery's Creek is a truly greenfield site with no surrounding houses and space to develop the necessary infrastructure without costly retrofitting. Consider the cost of the recent M5 upgrade. The need to safely undertake the necessary works while the road was in use added considerably to the cost.

In order to make the MICL site workable there is considerable local infrastructure that needs upgrading. There are dozens of intersections in the local area that are already overloaded. Converting busy intersections in the middle of Liverpool to grade separated intersections while they are in use will cost a very considerable amount. The "weave" on the M5 between Moorebank Ave and the Hume Highway is going to need a large and expensive upgrade.

Many of these infrastructure costs can be postponed or scaled back if the intermodal terminal were built at Badgery's Creek where new infrastructure can be built extremely cost effectively.

In addition, funds from the sale of the Moorebank site could fund the necessary infrastructure needed at Badgery's Creek.

Asciano has stated that it can increase capacity at Chullora up to 800,000 TEUs, refer to SMH article:

<http://www.smh.com.au/business/asciano-challenges-moorebank-freight-hub-20140701-3b6k0.html>

The PAC has already approved sufficient capacity at SIMTA to meet current needs of the region.

Since there is both scope to increase the existing capacity at Chullora and new capacity

already approved for Moorebank, there is no urgent need to develop another Intermodal terminal at Moorebank. The proposed MICL facility, when built, would dominate its local area for a century, so it is worth making the right decision, rather than rushing it due to a false sense of urgency.

For these reasons, there is time to build new rail capacity to the best location for a container terminal and if a decision for Badgery's Creek is made now, the necessary infrastructure can be built along with the planned airport infrastructure in a coordinated way, helping to contain costs.

The Proposal is incompatible with the local area

Some residents are as close as 400m to the site. Botany residents have been proven to have been very significantly impacted by essentially the same activity at Port Botany. MICL is closer to its neighbouring residents than Port Botany is to the Botany residents that have been proven to have been seriously affected by Port Botany.

At the community information session MICL disclosed that they have followed the same approach to calculating the noise impact as would have been used for Port Botany and that they certainly did not take into account the recent findings from Botany. While they are obliged to follow accepted practice, residents ought not to be disadvantaged because new information is not yet included in calculations. If MICL were to proceed, they ought to first undertake a new noise study showing how the effects shown at Botany transfer to the Casula and Wattle Grove context.

Noise from the terminal will reduce resident's ability to enjoy their outdoor living space. While a great deal of noise can be blocked by bricks and even windows, the outdoor spaces are very significant to the Australian lifestyle and residents ability to enjoy that space ought not to be diminished. No one wants to host a "Come to the industrial wasteland" BBQ and they shouldn't have to.

Large sealed areas on the MICL site such as hard stand areas and truck parking areas will absorb heat and reflect it back making the local area hotter in hot weather impacting residents enjoyment of their properties and increasing their cooling costs.

Freight terminals have crime problems. This is not a good neighbour for a residential area. Other than a few fences, the MICL proposal has nothing to combat the crime problem they wish to create.

Locating a large industrial complex adjacent to sensitive ecology and large residential areas significantly increases the costs to establish and operate the facility. It would make economic sense to locate the terminal in a different location without residential or environmental issues.

Local roads are too congested. The impact on residents travel time to work has not been calculated. MICL does not intend to compensate residents for the time they will lose on the

road and has no plans to contribute to the road improvements necessitated by its development, other than upgrading Moorebank Ave. Moorebank Ave is a special case because upgrading it is necessary for the development, so the true nature of the proposal becomes clear. There are significant impacts which MICL only wishes to address where it impacts MICL.

The river should be protected. The portion of the Georges River adjacent to the terminal is contained by Liverpool Weir, making it more like a long thin lake. Pollution and runoff will be trapped and could accumulate even if the contamination is slight. MICL have shown no signs that they have modelled the rate at which contamination will enter the river system and when, if ever, it will wash away. It is very concerning that there is no way to quality check the containers coming on site for leaks or structural integrity and no restrictions on what they may contain, other than banning illegal substances. Unless MICL can guarantee that no container will ever leak into the river in transit, they ought not to be permitted to receive any container containing material that could conceivably pollute the river if it were to leak.

The proposal would destroy extensive Military heritage on the site. A complete archeological survey of the site should be undertaken to evaluate the value of all buildings and other structures, such as Vietnam era training facilities and aquatic landing training facilities that are rumoured to have been established at the site over the years.

The Casula Powerhouse is an important cultural institution for the region and could not continue to deliver theatre with the number of locomotives rumpling past that will be needed by MICL. MICL ought to consider the needs of the Casula Powerhouse in its design, including soundproofing and vibration control.

The development is incompatible with the council's vision for the Liverpool waterfront. It makes a mockery of the local democratic process to allow large government funded companies to override the will of the people expressed in their council's plans for the city.

No-one knows how many trees would be destroyed by the proposed development, but other more sympathetic development could be built without destroying areas of native vegetation.

Finally, there is already a serious noise problem adjacent to the SSFL, with local residents enduring freight trains without the benefit of any noise amelioration at all. Since the operator of the SSFL cannot or does not prevent very serious noise impacts on adjacent residential areas, no project should be approved that increases SSFL traffic.

Local Infrastructure is insufficient to meet even the current demand

Numerous local intersections are already overloaded. Adding more traffic to these intersections is an unreasonable imposition on residents who need to get to work, get their kids to school and who should be able to access facilities in the local area. Adding more

traffic to these roads will also negatively impact the ability of local businesses to do business. Liverpool does not need to become uncompetitive as a place of business and employment.

The "weave" as traffic entering the M5 from Moorebank Ave crosses traffic exiting at the Hume Highway is already dangerous and would be made quite frightening by adding thousands of trucks each day.

The cost to refit the local infrastructure to meet the terminal's needs would be very significant and would negate any perceived advantage. Further, MICL intends that the costs to remediate local infrastructure should be carried by Local and State governments. If MICL's activity would necessitate upgrades to infrastructure, MICL should bear the cost, not the disadvantaged residents and their governments.

Despite being adjacent to rail on two sides, the site has no plans to access to passenger rail, significantly exacerbating the traffic problems it will cause to local infrastructure, as staff will be forced to drive to work. If MICL wishes to add so many workers to such a concentrated location they should provide access to Casula Station or should fund a new station on the East Hills line near Moorebank Ave to support workers.

No major planning decision of this scale should be rushed. Asciano's statement that they can increase capacity at Chullora means that the need is not urgent as MICL has claimed. Since the need is not urgent, the necessary infrastructure should be planned, funded and built before such a heavily intensive project is allowed to be built.

There is no plan to up-skill or resource the local police command to handle port related crime. Residents should not have to endure increased crime in the local area and without action by someone, there will be additional problems should the intermodal terminal go ahead. The area isn't ready for it and action should be taken to remediate it before any impact is felt by residents.

Similarly, there is not plan to equip and train the local Fire Station to handle HAZMAT emergencies. This needs to be in place before an intermodal terminal could be approved.

Many of the locomotives doing the local haul freight work are 55 years old or more and very polluting. The very short journey from Port Botany to Moorebank means that top line rail operators will not be the likely operators of the so called Port Shuttle service. It is incorrect to assume the locomotives are in good order or are well maintained or modern. Railing of containers in the Sydney area should be restricted to electric locomotives. The air quality improvements would justify the cost. We don't have steam trains pulling passengers on suburban lines. Why should we have ancient locomotives that ran alongside steam locomotives for a decade carrying containers to a suburban residential location?

Employment

The local area has a deficit of jobs. It needs more employment; a majority of residents are forced to commute out of area to find suitable employment. This makes the MICL proposal seem attractive on the surface, however there are two serious problems with the jobs impact of the MICL proposal.

Firstly, the terminal offers the wrong kind of jobs. The mixture of people in the Liverpool area has been changing for many years, with professionals and similarly qualified people growing as a proportion of the population progressively. The MICL project aims to bring precisely the wrong kind of jobs to the local area. There are no terminal operators under-employed in the local area, but there are plenty of professionals catching the train into the city or worse still driving to North Ryde, Macquarie Park, Bella Vista and so on. The true employment need for the local area is the clerical and professional jobs that residents are forced to leave their local area to find. The employment aspects of the proposal cannot be considered a benefit for the local area and should not be used as a justification for the proposal.

Other land uses would provide more employment and better employment. Even a mainly residential development would provide as many jobs as the terminal is intended to provide.

There is a second, more troubling concern around employment. The Intermodal proposal has been described as a jobs sucker. The reasoning is that whatever industrial areas there are within the terminal's vicinity, if the proposal goes ahead, these areas will gradually be redeveloped into warehousing. The adjacent light and medium density industrial areas are filled with panel beaters, air conditioning specialists, light manufacturing, bulky retail, a large bakery, some mixed commercial/industrial and a little warehousing.

With a large intermodal terminal nearby, businesses will be looking for land to build warehouses. Since the terminal has absorbed the available land, their choice is either to ship their goods 30-50KM to an area with space for warehousing or to redevelop locally. The result is that many small businesses employing 10 to 20 people each will give way to large possibly automated warehouses that will employ only a few in the whole complex. Residents will lose access to local services and the available jobs - blue collar, trades, clerical and management will be lost to the local area, significantly harming the local economy for the benefit of large companies based in the city, or in Melbourne or overseas.

Equity Issues

It is inequitable to impose another major undesirable infrastructure on the South and South-West. These regions already have most of Sydney's undesirable infrastructure and should not be seen as Sydney's easy solution for ugly projects. Examples of past abuses include: relocation of port facilities from the inner city to Port Botany, consideration of only south-west locations for a second airport, the location of all intermodal facilities in the south-west.

With a very large chunk of South-Western Sydney to be devoted to the new airport, it is not reasonable to also impose a separate (additional) intermodal facility on the same community when the two can be built together with no additional impact above the level that the airport would impose.

MICL intends to impose significant impacts on the local community. There is a huge and unacceptable direct impact, but the indirect impacts are potentially more serious for residents. It is inequitable to allow MICL to pretend that such a large development will have impacts that stop when you leave Moorebank Ave and join the M5. MICL cannot be allowed to avoid its responsibility to minimise or prevent these indirect impacts in the first instance and to fund or contribute to the funding of remediating them if they can't be prevented. Examples of indirect impacts and reasonable remediation that MICL does not include in its scope include:

- Road upgrades other than Moorebank Ave are someone else's problem. The road traffic modelling doesn't even extend beyond a couple of KM from the site.
- Passenger rail integration for workers is not even considered
- Impacts related to integration with the SSFL are portrayed as an issue for ARTC
- MICL accepts no responsibility for up-skilling or resourcing the local police command to handle port related crime or the local Fire Station to handle HAZMAT emergencies.
- SSFL noise issues and terminal-related increases in noise are not MICL's problem
- MICL paints the negative impact it will have on local employment as an increase in jobs by only considering the jobs within its fenceline.
- Health concerns are rather insultingly written off with the implication that residents don't take care of their health
- The consequential impacts of new businesses that will do business with the terminal and their traffic, noise and pollution are said by MICL to be a council decision, and are not counted in MICL's development impacts
- MICL avoids considering the opportunity cost of forgoing alternative development options, ignoring significant benefits to the local community that MICL will prevent from happening.

MICL has a very significant consultant workforce at its disposal with both a large number of specialists and a wide range of skills. Local residents don't review EISes for a living and are at a disadvantage due to the large number of technical concepts that must be

understood to respond in detail. Similarly, residents have a job and a family and simply could not devote enough time read the huge volume of the EIS even if they were already experts in all of the fields. While MICL has made a significantly greater effort to engage with the community than SIMTA did, the scale of the proposal prevents residents from understanding it in depth, hampering residents ability to respond and this introduces a significant equity issue that has not been addressed.

MICL has no measures proposed or in place to ensure that the standards and assurances it gives won't decline over time. There is no plan for an ongoing noise or pollution measurement regime or to police the agreed control measures and there is no reporting framework. Who would know if the level of air pollution or noise was significantly greater than the modelling suggested? MICL won't be checking and reporting. Local residents, like the Botany residents, will notice the impacts but won't have the information to force action.

Residents have been locked out of their riverfront by 100 years of military occupation. It is unfair to lock them out for another 100 years by locating a container terminal on the Liverpool waterfront.

It is inequitable to move port facilities from Sydney Harbour to Port Botany opening up harbour and riverfront land in the inner city for residents to enjoy when the move creates an overload at Port Botany, necessitating the development of a new Intermodal terminal forcing residents in a different part of the city to be locked out of their riverfront. In this respect consolidating at Port Botany is a form of wealth redistribution, taking land value from Casula and endowing it upon Balmain and Barangaroo. No reasonable person could see that as equitable.