

Introduction:

I understand a little about the economy of attempting to situate a freight hub at a point where there are major arterials, but the question will be discussed “At what cost?” The upgrade of thirty six intersections? The invasion and pollution of a residential area that does not consume the goods? How can this make economic sense? Is it because the land was a snap? The decision to build at Moorebank was made years ago, and unfortunately, is outdated. If trends in metropolitan growth, goods consumption, modern infrastructure project construction and access to arterials/transport were considered, would Moorebank still be best?

In an ideal scenario, an intermodal proximal to radial road arterials, railway connection, a port, an airport, all being proximal to the consumption and distribution of goods would tick some serious boxes and be cost effective. And if there were no ill effects for the environment immediately proximal to the project, there would be no objection. This is why I write.

Reasons why the proposal is the right idea:

To satisfy the growing needs of goods forwarding/logistics of Sydney

To have a development proximal to connecting major arterials to reduce travel time and minimise congestion

Employment opportunities

Conceptually, to have an intermodal that utilises rail rather than road to transport freight. This is fantastic for many reasons such as congestion abatement and net energy expenditure, but is negated somewhat due to its distal location from the foci of goods utilisation.

The site appears to have good connectivity options by rail and road

Reasons why this proposal is inadequate:

Heritage destruction

The plan does not entertain the idea of preservation of military heritage predating this development.

Property values

As part of the residual level of impact (section 8.2.1 of NSW Industrial Noise Policy) I do not believe that consideration has been given to property values in the surrounding suburbs that will be impacted directly and indirectly by this project. The proponents will not consider regulating noise or air emissions from vehicles associated with the development equating to no consideration. There are residents who have invested knowing nothing of this proposal several years ago who feel cheated by this development proposal, and given its proximity and effects on their quality of life, rightly so.

Increased traffic congestion

No need to expand on this point, as the negative traffic effects due to increased vehicular movements locally and on arterials such as M5, and queuing times at lights will be experienced. Also, there is the reassessment of traffic light duty, which will cause increased waiting times for commuters, workers and trucks alike.

Light spill

Although there are mutterings of “mitigation”, I, on behalf of the local community, certainly do not look forward to the extra light of an evening. This also will impact behaviours of nocturnal animals associated with the underdeveloped site.

Extra taxpayer cost associated with development

It is known that the number of intersections requiring upgrades for this proposal numbers over thirty, confirmed by the proponent’s traffic modellers and also by independent modelling by members of RAID (Residents Against Intermodal Terminals). Who is going to pay for this? I believe there is no doubt. The road and intersection upgrades alone will result in significant cost.

Reasons why this is unacceptable:

Poor location choice

Without a doubt, this is the wrong position given consumption of the goods. The net energy expenditure and traffic movements are excessive and not economical in comparison to a more viable alternative eg Badgery's Creek (potential true intermodal), Eastern Creek (more efficient intermodal given goods destination and land zoning).

There will be excessive impact on moderate density population (proximal local residents), who will be exposed negatively by the proposal every hour of every day of every year.

The outdated location has not taken into consideration more recent civil projects including rail, road, and airport developments which are currently being constructed or in the process, yielding more common sense alternatives than Moorebank.

Compounding negative effects of SIMTA and MICL proposals with land rezoning

Subversively the developments have been staggered in their presentation to the public, in an attempt to dupe the public into the idea that the impacts are essentially halved and therefore half as significant. Unfortunately the effects of the development proposals will compound, and either proposal does not appear to include in its environmental impact data the existence or effects of their proposed neighbour (refer noise).

Risk to community maximised

If one can draw their attention to the risk matrix which offers through a likelihood and severity analysis a degree of "harm" for an activity. This process has been dutifully conducted for a number of facets of the project including environmental impacts. Given the localised and continuous release of particulate matter and polycyclic aromatic hydrocarbons from diesel combustion, I believe that the risk matrix should have been assessed as probability "almost certain" and consequence "severe", giving the resultant risk as "**very high**," which, under any circumstance would indicate neglect if the activity were to progress – a point which even the proponents tout. I would anticipate multiple but localised fatalities in the medium to long term, mostly due to the next point.

Lack of air quality considerations

There is no doubt that there will be medium to long term health effects of such an operation given its proximity to pre-existing residential settlement.

There are measureable indicators for air quality, and there are more elusive chemicals that are produced by the incomplete combustion of diesel such as 3-nitrobenzanthrone, nor 4-nitrobiphenol, nor benzopyrene which currently have no regulations or guidelines regarding exposure, along with other known carcinogens. (Source: SA Health). This effect will be magnified by the quantity of emission and the lack of convection and circulation of the ambient air due to topographical and meteorological considerations of the Liverpool basin.

Intake of PAHs from contaminated soil may occur via ingestion, inhalation or dermal (skin) exposure to contaminated soil/dust, and from inhalation of PAH vapours. Tilling of dry soil can result in ingestion of small but measurable amounts of carcinogens. (Source: SA Health)

This point is critical - since the study of the detrimental health effects of nanoparticles is still in its infancy, and the nature and extent of negative health impacts from diesel exhaust continues to be discovered.

The transport hub has realistic potential to gravely harm the health of the workers employed on site, workers at the NDSDC (National Defence Storage and Distribution Centre), surrounding commercial venture employees, with the most impacted group being surrounding residents.

Increase in patient load on the health system

There is a city in central Queensland called Gladstone that is a heavy industry town and has been for years, with a coal fired power generation station (the largest one of its kind in the southern hemisphere for its time) and companies such as Queensland Alumina Limited which have been present for over forty years. It has been known that these industries have been heavy particulate polluters with coal dust and alumina dust being released with reasonable consistency into the atmosphere. In a report commissioned by Queensland Health, it was found that between 1996 and 2004 Gladstone had a chronic lymphocytic leukaemia (CLL) rate twice that of the state average. These incidences have occurred with medium term regular exposure to pollutants, which is what you will expect with this proposal. It will not only affect workers of industry, but also residents. The real cost may be incalculable in the short term.

To take a risk based approach, I can not help but believe that the effects of development-associated air pollution will be more ubiquitous and far reaching than modelling accounts for, impacting quality of life for residents, and further burdening acute, chronic and palliative care for disorders involving the lung at local hospitals such as Liverpool.

Inability to regulate incoming/outgoing emissions/pollution

The proponents of the development are not capable of addressing the pollution from vehicles accessing and egressing the site, and have stated that any upgrades of, for example, trucks to a five or six star Euro emissions level for particulates, will be the choice of the individual operators. There is no plan for the proponent to retrofit vehicles to minimise or reduce pollutants or noise. Effectively this is ratifying the gross pollution of the site, whilst accepting no responsibility and focussing furthermore on the (lack of) impact of the terminal.

Nuisance noise

As outlined by the EPA guidelines for noise emission, I fail to see best management practice (BMP) or best achievable technology economically achievable (BATEA) strategies fully (or even partially) and appropriately employed in this proposition to mitigate noise to residential areas from;

- 1) Traffic, hoists/cranes, forklifts operating on site
- 2) Trucks and cars accessing and egressing site
- 3) Trains accessing and egressing site

The proponents do not suggest any noise buffering on the eastern side of Moorebank Avenue for example. We are interested in *effective* noise buffering, not a token investment to comply with requirements. There has been suggestion that continuous emissions monitoring will occur, but no mention of what operational changes will be actioned if exceedances are encountered. Ie what are the response mechanisms for excess noise pollution?

Forget not the recent media coverage of noise impacts of rail wheel squeal from the Botany container handling facility where nuisance noise has been reported by residents over 3km away, and we are talking of introducing this type of issue within 500m of residents?

According to the National Institute for Occupational Safety - NIOSH - noise exposure should be controlled so that the exposure is less than the combination of exposure level. A valid question is, "Was the noise assessment of the MICL and SIMTA developments considered as a combined exposure in the EIS?"

Inadequate provisions for the control of noise at its source, its transmission to, and its reception at residential areas is identified.

Pest species introduction

Given the proximity to both a terrestrial and an aquatic environment (Georges River), I ask what pest species of vermin, beetles, borers, fungus and so forth will be inadvertently released into the natural habitat through the transportation and storage of containers at the proposed facility. I know not of a biological quarantine area that is proposed that addresses potential threats to the ecology of the surrounding habitat. There is ample opportunity for pest organism release into the adjacent land which is unique to this site given the surrounding geography (ie bushland and estuarine river system).

Maximum detrimental effects for moderately populated residential area

Let me get this straight. With the subversive, yet forceful “application” for land rezoning to cater for such a development, this is madness! This development is essentially proposed to be built and operate adjacent a residential precinct, and is neglecting the quality of life and health of the residents of surrounding residential suburbs. Residents have settled in the area in good faith in what was a desirable quiet area, but are going to be cheated the lifestyle they deserve by this proposition.

The proposition is too proximal to neighbouring establishments – from 400m - exposing residents 24 hours a day, seven days a week.

Population density is close to 30 people per hectare and growing – high number of residents will have exposure and be affected, and in the medium to long term this will reflect unfavourably at Liverpool Hospital.

The reclassification of the land is a significant oversight of utilisation of the land, and it can not be said that there has been consideration for residents, commuters, or the Government’s affordable housing scheme for example.

How many people is it anticipated that this project will adversely affect? The answer is “Too many,” given its proposed location and proximity to residents.

Poor land utilisation

Other options could be to rezone the area a sanctuary or green space and rejoice in its underdevelopment, or develop it into another less pervasive and polluting venture whilst solving some Sydney housing issues, or create more employment by creating a commercial venture, or even better, return services

to the community such as a library/arts/fire brigade. There are many alternate less destructive options.

Conclusion:

The health cost to a moderately populated community through operational pollution that this proposal will introduce to the residents, the reduction of the quality of life for residents and commuters, the burdensome cost to ratepayers, the truth that the development is no longer appropriate at Moorebank are significant counterarguments for the development of this proposed State Significant Development at its current location in south western Sydney.

The proposal needs to be located;

- 1) logically where consumption of goods occurs,
- 2) where there is lower population density i.e. less people that are impacted, and
- 3) where an intermodal *should* be located after a modern infrastructure assessment.

Only then will a valid and well planned proposal evolve.

I do not deem the employment opportunities and perceived value of the proposal's location to outweigh the detrimental health effects and risk of the development to the local community. Secondary topical arguments exist such as disruption to commuting, excessive public infrastructure expenditure, public nuisance and heritage destruction to name a few. The reduced health impact and positive economic impact at a location that provides a minimum amount of impact to the least amount of people needs to be considered. This is defined as risk.

If the development is to remain at the proposed site, the deleterious effects of the project should be mitigated sparing no expense for the health and quality of life for the many residents in surrounding suburbs who have been duped by inappropriate land zoning and will be adversely and extensively affected by this project. This is undoubtedly a nuisance proposal amongst suburbia at the Moorebank site, and the very **least** that the proponents can do is minimise the harm to the local community and the environment given its ubiquitously polluting and cost ineffective nature.

Seemingly, this is a short sighted attempt to justify an economic outcome for the state at the grave expense of the local community – the effects of which will be seen in all processes from its construction and operation to the medium term public health morbidity effects that will only be confirmed in years to come.