

Submission opposing Moorebank Intermodal Terminal

Application number and project name

SSD 5066/EPBC 2011/6086

Moorebank Intermodal Environmental Impact Statement

Submitted by Narelle van den Bos, 22 Padbury St, Chipping Norton 2170.

Below I have listed a series of reasons why I object to the intermodal being approved at Moorebank. I have the following link for the PowerPoint we have put together which explains the issues in a very simplified manner in order to help clarify what our issues are. If there are problems understanding this we would be more than happy to present the issues. I feel that it is only fair that after all the work we have carried out pro bono that we should be given the courtesy of having our reasons for opposing the intermodal addressed one at a time clearly for everyone to read so that the public can be totally assured that we have been given due respect and after the event it can be published if necessary. You are being paid to review my work and I expect more than a cursory glance with words like 'the experts say'. We need to see the science. We are representing the thousands of people in the Liverpool precinct while the proponents of the Moorebank intermodal are representing only a few big companies.

PowerPoint Link

www.transportmodelling.com.au/Intermodal/Moorebank_SMH_2.pptx

Table of Contents

1. All Sydney's Traffic will be slowed by Moorebank Intermodal!!!!	4
2. I am concerned that the Financial Review (article copied below) should report that the Moorebank intermodal is going ahead when it has not yet passed the EIS and certainly the closing date for the submissions to MICL has not even arrived.	5
3. The predictions for future freight coming into Port Botany are overinflated.	6
4. I am concerned that there is a cap on the freight allowed to enter at Port Newcastle.	7
5. More traffic is being added to an already congested area and taken off a road built to relieve traffic issues.	8
6. The traffic modelling does not include the widely advertised proposed Southern Intermodal development which is to be developed at Badgerys Creek (Slide 76 found in the Draft Broader Western Sydney Employment Area Structure Plan).	9
7. The true impact of the warehousing traffic, that Moorebank Intermodal will encourage, has not been modelled.	9
8. The 8160 trucks predicted to be emanating from the intermodal were not converted to passenger car units for the public to read.	10
9. We haven't been able to see the business case showing the economics	10
10. The induced traffic that occurs between warehouses has not been studied.	11
11. A wider study area needs to be used to include	11
12. The Moorebank Intermodal is being built where very little freight is required.	11
13. The intermodal is being built on an island surrounded by bridges (Slide 35) which make road improvements even more expensive.	11
14. It is not desirable to put Moorebank Intermodal close to Liverpool CBD. There is now housing a few hundred metres from the site.	12
15. Residents that live so close to the intermodal will have to tolerate trucks emanating from the Intermodal largely during the night.	12
16. Surely it cannot be economical to force freight to travel by rail to Moorebank and then force trucks to travel up the M7 to Eastern Creek.	13
15. The flawed business case has been used	13
16. We are unable to have the report shown in Slide 15 taken off the redacted list so that it can be read by the public before the submissions close.	14

<i>17. It should be the responsibility of MICL to study a holistic view of the roads that will be traversed by trucks emanating from and going back to the intermodal.</i>	<i>14</i>
<i>18. 34 intersections around Liverpool need upgrades</i>	<i>14</i>
<i>19. I am concerned as to how the residents of Liverpool cope if the Intermodal is built and only a few of the necessary infrastructure upgrades are carried out.</i>	<i>15</i>
<i>19. Only set aside \$750 million to improve the infrastructure around Liverpool.</i>	<i>15</i>
<i>20. How will the trucks safely merge onto the M5 and then weave their way through the traffic leaving the M5 for the Hume highway.</i>	<i>15</i>
<i>21. Loss of jobs</i>	<i>15</i>
<i>22. I am concerned as there is no science behind locating this development at Moorebank.</i>	<i>16</i>

1. All Sydney's Traffic will be slowed by Moorebank Intermodal!!!!

I certainly do not think it is acceptable to make every vehicle in Sydney's traffic network slow their travel because of the Intermodal. I have a huge issue with this and I think this statistic, coming from the MICL, should be advertised to the whole of Sydney. The calculations for this are shown below using MICL's

numbers. **Something is seriously wrong when the whole network is slowed down by one development. This sounds right as we have been saying. 'This is not the best place for the intermodal.' These calculations are the proof we needed to show this. Thank you so much to MICL. They have just shot themselves in the foot.**

Just read below for the explanation. It is perhaps a little tricky but I would be happy to help you understand how simple this really is.

These statistics are taken directly from the MICL EIS.

Wider network impacts

Strategic modelling using Bureau of Transport Statistics (BTS) models undertaken indicated that by 2031, metropolitan Sydney would experience the following network-wide benefits of transferring containers to Moorebank by rail:

- a saving of approximately 56,125 truck vehicle kilometres travelled (VKT) per day; and
- a saving of approximately 1,265 truck vehicle hours travelled (VHT) per day.

This is accompanied by a daily saving of approximately 2,530 VHT by non-truck traffic across the Sydney road network. The vehicle kilometres for non-truck traffic would increase by approximately 10,670 VKT. This is probably caused by traffic migrating from adjacent routes which are more direct, but more congested, to take advantage of the reduction in the truck numbers and congestion along the M5 and the other routes, as indicated in Figure ES.3.

Network speed:

From the statistics above, it is easy to determine the average network speed: $56,125 / 1,265 = 44.4\text{km/hr}$. From transport modelling experience

- During the AM and PM peaks, the network runs at an average speed of 30 km/hr. These two periods represent five of the 24 hours day.

- During the Inter Peak, that is the six hours between 09:00 and 15:00, the network runs in the middle to higher 30's km/hr.
- Even with the slighted amount of traffic, say late evening, the strategic network operates in the low 50's km/hr.

Given the travel time profiles in the EIS, this implied speed of 44.4 km/hr appears to be on the high side.

Impact on non-truck traffic:

The same calculations can be done for the non-truck traffic: $-10,760 / 2,530 = -4.2$ km/hr.

In other words, in the Project Case, the net impact for the affected cars (all the red links in Figure ES2) will have a reduced speed of 4.2 km/hr.

It is unfortunate that in the MIC EIS, the VHT and VKT figures are not given. This would have allowed the reader to calculate the average reduced speed reduction of the 14,223,413 drivers in the model.

Sydney's whole network will run slower, and therefore more fuel would be consumed, more pollution will be generated and there will be more accidents.

If the location of the intermodals was planned correctly the net result would be an increase in Sydney's average speeds.

2. I am concerned that the Financial Review (article copied below) should report that the Moorebank intermodal is going ahead when it has not yet passed the EIS and certainly the closing date for the submissions to MICL has not even arrived.

This implies to me that no matter how serious the problems are with implementing the project it is going to go through anyway and we as taxpayers will pay for it so that a few people can make a lot of money and a lot of people i.e. the Liverpool precinct (well over 100 000 people) will be the losers. How can a deal be struck on building the intermodal before it has had proper consideration?

Australian Financial Review 6 December 2014

Green for freight terminal

Jenny Wiggins

The federal government has struck a deal with two private companies to build a \$1 billion freight terminal at Moorebank, ending years of bickering over the best way to transfer shipping containers from trucks to rail cars in Sydney's south-west.

The government agreed that logistics group Qube Holdings and rail operator Aurizon can develop the Moorebank terminal on federal land and on an adjoining site owned privately by the two companies.

Aurizon and Qube will invest several hundred million dollars in the freight hub over the next few years. The government is expected to contribute a small portion of the money for the development of some of the terminal's infrastructure.

The deal, which comes after the government began exclusive talks with Qube and Aurizon in May, is designed to reduce traffic congestion around Port Botany once the terminal starts operating in 2017 by reducing the amount of freight carried on trucks.

"While there are still challenges across the supply chain, the intermodal will see rail become a mainstream choice to move goods to and from Port Botany," said Brendan Lyon, chief executive of Infrastructure Partnerships Australia, a lobby group.

The Moorebank site will include an open-access import-export freight terminal with a capacity of 1.05 million containers a year and an interstate freight terminal with a capacity of 500,000 containers a year.

The government's site at Moorebank, which is occupied by the Department of Defence, will be combined with the land owned by Qube and Aurizon and leased to the two companies.

Qube and Aurizon, which have a 70/30 joint venture, are pleased with the agreement, which requires final approval by the federal government.

The companies expect to provide users of the terminal with competitive transport and storage rates.

3. The predictions for future freight coming into Port Botany are overinflated.

The Freight Infrastructure Advisory Board, Transport for NSW and Department of Transport and Regional Services all give a much lower prediction for future freight growth (about 4%). This should mean that there is the time to study the whole of Sydney planning including intermodals professionally. (See Slide 5, 6, 7 and 8).

Is the government now aware that these numbers were inflated and there is no longer the need for Moorebank to be built as the other planned intermodals should accommodate the future predictions?

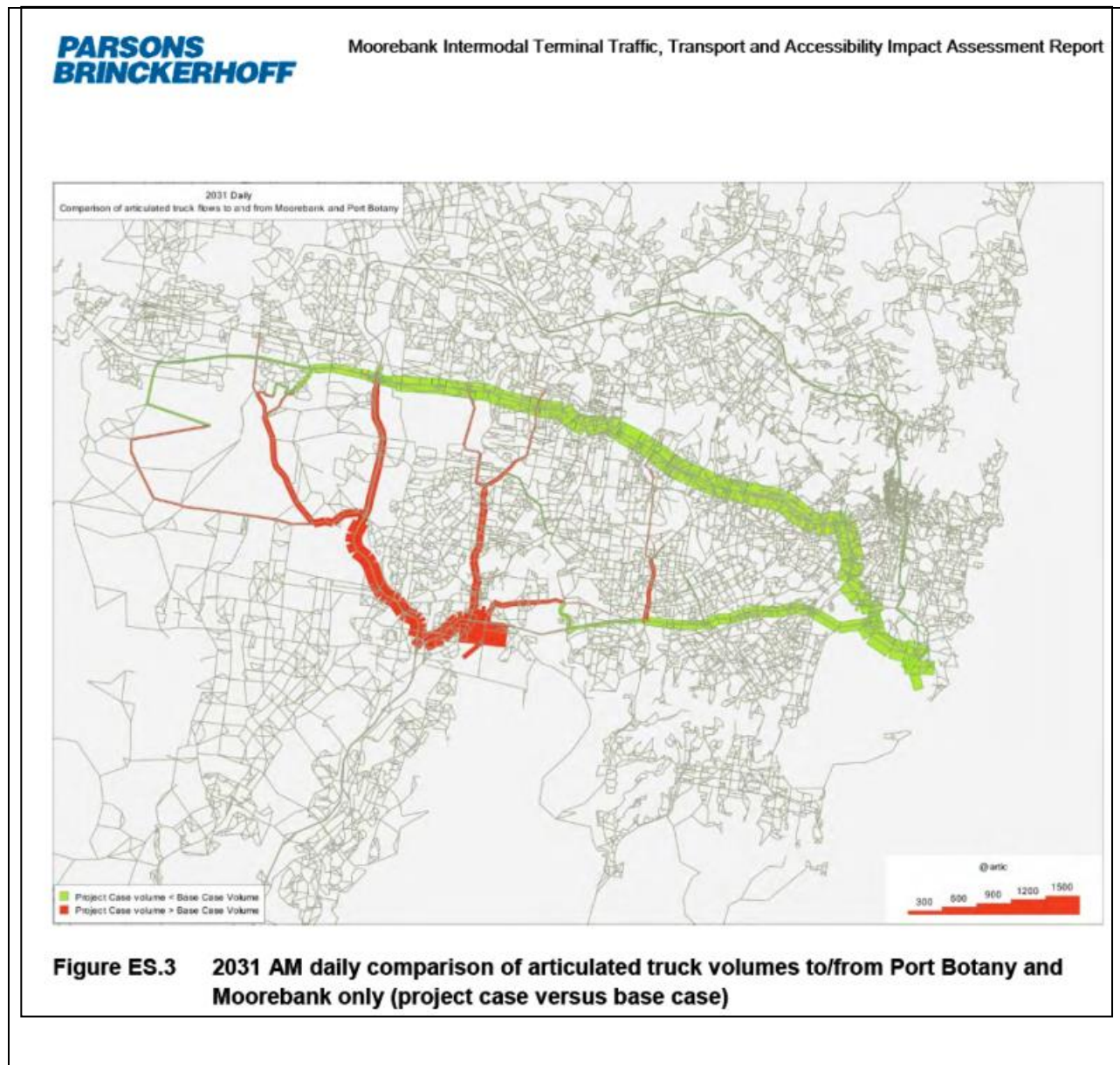
Interestingly in the MICL Report 046 Technical paper 1_Traffic Transport and Access(A). pdf in the Executive Summary the growth in containers is recorded as 4.2%. This matches the Bureau of Statistics figures while on page 7 of the report the annual growth is referred to as 7%. The report states that table 5.1 shows that 7 million TEU's will be coming in by 2031 but when table 5.1 is consulted it actually states 5 million TEU's by the Bureau of Transport Statistics. Oh dear me why the terrible mix up? Why is this recorded incorrectly? MICL seems to be very confused as to what is predicted! Let us get things right

here and recognise that the freight growth is estimated by three reputable organisations as about 4% not 7%. This stops the urgency for the need for the intermodal.

4. I am concerned that there is a cap on the freight allowed to enter at Port Newcastle.

Why is the cap for Newcastle SO low? Surely if the market requires freight to enter at Newcastle it should be allowed to! This would make the congestion through Sydney much less. This is a very significant question for Moorebank Intermodal as it asks the question as to why would more truck traffic be forced through Sydney when it should be going through Newcastle. At least Newcastle should be allowed to take its own freight and the freight needed for the northern areas of NSW. Therefore the impact this would have on Moorebank is a serious one as it has the potential to greatly reduce the need for intermodals in the Sydney metropolis which would be an enormous benefit to Sydney in terms of traffic and pollution.

5. More traffic is being added to an already congested area and taken off a road built to relieve traffic issues.



This difference plot shows that the West Connex will have less traffic on it (green lines). A pity as I thought it was being built to improve the traffic situation in Sydney. The red lines show how the traffic will increase around Moorebank. I don't even know how the proponent could put this plot into their reports. It doesn't make sense to add traffic to already congested roads and take it from a new road geared to relieve traffic issues.

6. The traffic modelling does not include the widely advertised proposed Southern Intermodal development which is to be developed at Badgerys Creek (Slide 76 found in the Draft Broader Western Sydney Employment Area Structure Plan).

The Freight matrices may not have added this to their networks as yet but that does not allow MICL to be sub professional and ignore it in their calculations. The Bureau of Freight statistics has added 200 000 TEU's to Enfield making its capacity 500 000 TEU's instead of 300 000 TEU's. This is of course questionable as the cap on Enfield is 300 000 TEU's which has been determined by a lengthy legal process. These extra TEU's should have been taken to the Southern Intermodal as the future freight will be here, servicing a population expected to be twice the size of Brisbane forecast for the West of Sydney (Slide77). It is possible that the freight intermodals have not included the Southern intermodal (as it is in the Bureau of Freight statistics) to take future traffic off the roads so there appears to be more capacity for the MICL trucks.

The traffic modelling needs to be done again so that the future freight is sent to the current planned locations which were announced by the federal government.

7. The true impact of the warehousing traffic, that Moorebank Intermodal will encourage, has not been modelled.

To avoid the extra trucks that come from warehousing and produce low estimates of trucks emanating from Moorebank the TEU's have been put onto pallets (203 600 TEU's will be palletised). This is not a small number and will have a huge impact on Liverpool precinct. These pallets are to be taken to other locations for destuffing. It is the destuffing which adds dramatically to the trucks emanating from the Intermodal.

It is surely essential that as part of the Moorebank Intermodal these pallets should be studied including where they are expected to go and the resulting truck movements. It is because of the intermodal that

Page | 9

these trucks will be using the roads around Liverpool and therefore they should be studied so that the government is aware of the true impacts of the Intermodal and can provide the extra infrastructure necessary to accommodate these extra trucks. This should be included as part of the warehousing traffic resulting from the Intermodal. (There is 1250 Hectares of land (slide 65) that has been encouraged to be taken up for warehousing.)

The traffic modelling needs to be done again taking into account the warehousing in other locations resulting from the Moorebank Intermodal. This warehousing is more than the TEU's being processed at Yennora (170 000 TEU's See slide 23) which has 6 000 trucks daily flowing from the site. It should be remembered that not all of this processing at Yennora involves stuffing and destuffing. (If it was totally warehousing then the number of trucks would be greater).

8. The 8160 trucks predicted to be emanating from the intermodal were not converted to passenger car units for the public to read.

This would be 24 480 passenger car units which gives the public a better idea of the volume of traffic coming from the intermodal every day.

We believe if the true figures for the warehousing are included in the modelling that the number of trucks would be much greater than the 8 160 trucks that MICL has indicated.

9. We haven't been able to see the business case showing the economics

of

1. Transferring freight from Port Botany to Moorebank by rail,
2. Transferring the pallets to another warehousing location and
3. Then loading onto trucks once more and the freight finally being taken to the required location.

Surely the public has a right to see this. Is this still economical for the users?

10. The induced traffic that occurs between warehouses has not been studied. (Slide 71)

This involves including all the little white vans that are not trucks but trades and other service vehicles.

These vehicles need to travel on the roads as well and should be included in the traffic estimations.

11. A wider study area needs to be used to include

- The highest accident spot in Sydney only a few kilometres away from this gigantic proposal on the Hume Highway (Slide 61 and 62).
- The CBD parallel roads (Slide 63). Bigge Street the parallel road to the Hume Highway is already being used instead of the Hume Highway impairing access to the Liverpool regional training hospital.

It is clear that the intermodal traffic will have a profound effect on these locations but yet it is not included in the traffic study. From an ethical point of view alone this should be studied as there is a potential for more lives to be lost. **Why isn't this part of the DGR (Director General's Requirements)?**

12. The Moorebank Intermodal is being built where very little freight is required. (Slide 10)

45% of the freight goes to Eastern Creek. Once Eastern Creek, Enfield, Minto and The southern

Intermodals are fully operational there should be no need for Moorebank especially if Port Newcastle was allowed to take its natural course.

13. The intermodal is being built on an island surrounded by bridges (Slide 35) which make road improvements even more expensive.

There is a lot of land where the Southern Intermodal is planned and this will be located much closer to the future freight markets. There is no rush for an intermodal at Moorebank and the Southern

Intermodal has the required designated non-residential space around the proposed site.

14. It is not desirable to put Moorebank Intermodal close to Liverpool CBD. There is now housing a few hundred metres from the site.

It is specifically pointed out in Slide 17, 18 and 19 that **Before projects are approved, residential areas surrounding intermodal terminals be designated in order to give effect to this policy.** Ref: **R a i l i n g P o r t B o t a n y ' s C o n t a i n e r s J u l y , 2 0 0 5** Proposals to Ease Pressure on Sydney's Roads **Freight Infrastructure Advisory Board**. The original residential free designated areas have now been built on. It may have been a good idea once to have an intermodal here but it now does not satisfy these requirements!!!!

15. Residents that live so close to the intermodal will have to tolerate trucks emanating from the Intermodal largely during the night.

We know that this is to allow trucks to take advantage of less traffic congestion at night but what about the people? Surely because of such severe traffic restraints it is a much better proposition to build the intermodal where it is required for future freight, where there is less traffic congestion and where there are fewer people to be effected.

If Port Botany's trucks will operate at night (half of all the truck movements will be between 18:00 and 07:00, than it can safely be assumed that the same operation will occur in Moorebank.

Table 2.5 Operational characteristics – Port Botany

Operational characteristics	2011	2021	2031	2041
Annual Operational Days	303	313	323	333
AM peak (0700-0900)	13.3%	13.3%	11.9%	9.2%
Inter peak (0900-1500)	41.1%	41.1%	37.3%	27.6%
PM peak (1500-1800)	15.0%	17.1%	16.8%	13.8%
Night time (1800-0700)	30.6%	28.6%	34.0%	49.4%

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This table is found in 048 Technical Paper 1_ Traffic transport and access (Part C).pdf , Appendix J, Strategic traffic modelling report (August 2014), Page

16. Surely it cannot be economical to force freight to travel by rail to Moorebank and then force trucks to travel up the M7 to Eastern Creek.

Wouldn't it be more economical and pollution saving for these trucks to travel straight along the West Connex to where they are required? Has there been some deal done with the M7 as they stand to benefit considerably by forcing trucks to take this tolled road?

15. The flawed business case has been used

The freight is assumed to come to Moorebank in the first place rather than costing the benefits on the actual case where trucks pick up their freight from Port Botany and take it straight to the locations where it is required. Slide 12 and 13.

16. We are unable to have the report shown in Slide 15 taken off the redacted list so that it can be read by the public before the submissions close.

Despite considerable effort we have been unable to have the whole report, yet we are told about all the benefits we are to receive.

17. It should be the responsibility of MICL to study a holistic view of the roads that will be traversed by trucks emanating from and going back to the intermodal. Surely it is futile to think that the trucks vanish a few kilometres after leaving the Moorebank Intermodal site. MICL was shown the issues we have on Slide 23 and issues with warehousing (Slide 68) and induced traffic (Slide 71).

18. 34 intersections around Liverpool need upgrades

The intersections that need upgrading around Liverpool should be documented in a report put out by RMS or another organisation so that the government is able to make realistic estimates on the future infrastructure upgrades that are necessary around Liverpool before the Moorebank EIS is passed.

These intersections which require upgrades are identified by Liverpool council, Bankstown council, Campbelltown council, TfNSW, M5 Widening, SIMTA's report. Slides 27 to 37. These upgrades are hugely expensive for example a large number of trucks emanating from Moorebank Intermodal will travel up Moorebank Avenue only to meet the already congested intersections of Moorebank Avenue/Heathcote Road and Moorebank Ave/Hume highway. The solution to this traffic issue needs to be sorted out now before the project is approved. The solution is likely to be very costly. This is not the worst of the issues here in Liverpool, Hoxton Park Rd/Hume Highway, Henry Lawson's Drive/ Hume Highway (which will take 25% of MICL's traffic), Milperra Rd/Henry Lawson's Drive which will all be heavily affected by the Moorebank Intermodal are all likely to require graded intersections. These are a phenomenal amount to build. We do hope the government has a LOT of spare cash.

19. I am concerned as to how the residents of Liverpool cope if the Intermodal is built and only a few of the necessary infrastructure upgrades are carried out.

This is a very real question we expect a very well thought out answer.

19. Only set aside \$750 million to improve the infrastructure around Liverpool.

Why hasn't the public been made aware of how this money is to be spent before the Intermodal is given the green light? Maybe we wouldn't be so worried if we could see where the changes are going to be made to improve the current local traffic conditions rather than just telling us there is going to be more traffic.

20. How will the trucks safely merge onto the M5 and then weave their way through the traffic leaving the M5 for the Hume highway.

MICL does not know how to solve this problem as yet or is this going to be studied using a highway capacity manual 2000 instead of HCM 2010 as it was by the SIMTA consortium? Are we expected to allow this intermodal to be passed and then hope there is a way of solving this huge issue? There simply is not enough distance on the M7 to allow the trucks to enter safely. Come on guys, get real, these are issues that need solutions before passing the Moorebank Intermodal.

21. Loss of jobs

I am concerned that the government will allow the approval of a development in Liverpool that will most likely dry up many of the jobs that currently exist, when it is jobs that the South West so badly needs. While the Intermodal itself may appear to contribute jobs to Liverpool it actually has the potential to take jobs as the 1250 Hectares of land available for industry has been encouraged to be taken up for warehousing. Warehousing employs far fewer people per hectare than other industries and

with such a large number of warehousing sites developed the overall result is that the number of jobs available in Liverpool will be decreased. Why doesn't the government understand this simple principle?

22. I am concerned as there is no science behind locating this development at Moorebank.

I really wonder that we have wasted the last two years compiling information about the science behind Moorebank Intermodal, writing two books for your benefit so that you could see how badly flawed the development is. You the government have not even given us the courtesy of reading the books and replying to us with a coherent argument as to why the intermodals should still go ahead. Every argument that has been put forward as to why they should be build can be refuted with extremely strong counter arguments and scientific information and still you, the planners, think that this is a good idea. I simply do not understand it.

Again for your reference the two books we have written are

'Moorebank Intermodals Key Assumptions Require Closer Scrutiny'

http://lcit.com.au/wp-content/uploads/2013/06/Intermodals_Book_Web_V19.pdf

Moorebank Intermodal, Better Options

www.transportmodelling.com.au/Intermodal/MoorebankIntermodal_BetterOptions.pdf

We would also ask that we receive some logical argument refuting what we have written. That logical argument does not come from the MICL reports.

I am dumbfounded as to why the government proposes to build Moorebank intermodal at this site when there is NO science to support it being there. I don't want answers like 'this is being investigated

or reviewed'. I want answers like 'this is what is going to be done about it with details of how it is to be done,' before it is approved.

As we are now in contact with the Sydney Morning Herald and I am starting to see possible connections to the cap on the Newcastle Intermodal with the rush to have Moorebank Intermodal approved and over inflated estimations for freight entering Port Botany I have also started communications with ICAC. Therefore I have sent a curtesy copy of this submission to both the Sydney Morning Herald and ICAC.

Unfortunately this had been necessary because although we have written books and pointed out the flaws in the argument for Moorebank Intermodal it seems to be falling on deaf ears. The issues we personally took to Brad Hazards Office (Department of Planning) about SIMTA intermodal were never addressed even though they were submitted through the correct channels. The EIS was approved without the true facts being used. The atrocious modelling was left as it was, unacceptable. It is with this in mind that we are expecting better of the planning department this time round.

Regards

Nell van den Bos