

December 2014

Attention: Director, Infrastructure Projects  
Planning Systems  
Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Dear Director,

**RE: Moorebank Intermodal Terminal EIS SSD-5066**

My submission is in objection to the Federal Government's Moorebank Intermodal Company (MIC) proposal to build a freight facility on Moorebank Avenue.

In the past five years, first as a candidate and then as the State Member for this area, I have become very well acquainted with this proposal. Knowing the background to the project I can see major areas of concern with the EIS that has been submitted. I know the way this community lives and operates, and I can see that this is not appropriate for this area. I ask that you read the submission with the community's best interests at heart and not just with what may help to free up capacity at Port Botany. We are not the only location for this freight terminal, and we are definitely not the best option.

**FINANCIAL CONSIDERATIONS:**

It has been estimated that approximately \$1B of road upgrades need to be undertaken for this proposal to be effective. This seems like a very large sum when considering that it is estimated to only bring \$9B of economic benefits over the 30 year operational period. This figure is before costs are taken into account.

Apparently, according to the MIC, the South Western Sydney community will benefit by \$120m a year through "improved productivity, reduced operating costs, reduced costs associated with road damage, congestion and accidents, and better environmental outcomes". As you will see in my submission, these are unlikely to have a positive benefit on the local area, and any financial gain would be unlikely to go back into the South West economy even if they did.

Locally, fewer jobs will be created, more traffic congestion will be caused (the EIS gives it's key focus to the benefits to the M5 between Port Botany and Moorebank Avenue and not to impacts on local roads), potentially more local accidents, while noise should reduce on the M5, the homes surrounding the intermodal will be impacted, and surely the bottleneck around Port Botany will be relocated to Moorebank causing detrimental impacts on our economy and lifestyle.

I believe that "consideration of the no build alternative" was ruled out early on due to the "significant economic and social consequences". The community response and the research from the consultation period should now highlight that the detrimental impacts on the community far outweigh the so-called positives.

### **"EARLY WORKS":**

The request to undertake "Early Works" and thereby start demolishing some buildings is too eager. Some of these buildings have heritage value, the land has Aboriginal significance, and there are environmental impacts – to destroy these before obtaining permission for the actual project, or approval for the concept would seem to be around the wrong way.

### **CONSULTATION:**

Chapter 5 – Stakeholder and community consultation says that because of the scale of this project MIC had to allow the community to have 40 business days and 60 calendar days to read and respond to the EIS. There is no doubt that this will have an impact on local residents and to have only given 62 calendar days, including the day it was announced, the day it is due, and a public holiday is not showing respect to the community. This was an opportunity to be a good neighbour and exceed the time they were under obligation to offer, especially as the 2000-3000 page EIS is cumbersome, and technical for the layperson to work their way through.

I note that in section 5.4.2 the MIC has committed to three open community information sessions. They intended for these to be held in Casula. It is worth noting that at every other session offered, Casula has been the least well attended location.

There is also confusion in the community about there being two proposed intermodals. The joint venture announced during the consultation period for the MIT has further added to the confusion. Local residents are unsure as to who is giving the correct information and some feel they have already voiced their concerns to the idea without realising there are two (or potentially three) proposals to address.

Confusion is also rife as to which rail entry will be chosen and the fact that there needs to be another State Significant Development proposal lodged with the actual layout provided. Residents really should know what they are assessing when replying to this EIS, but the complete picture has not been provided.

It seems that unfortunately the MIC has not made every effort to inform local residents about their proposal, as only residents in Casula, Wattle Grove, Holsworthy and Glenfield were sent a copy of the Community Update newsletters. It is unfortunate that the residents of Moorebank, Chipping Norton, Hammondville and Liverpool, were not also included as they would also be affected and deserve the opportunity to have been consulted by the proponent. I don't know how long the residents of Glenfield have been receiving the information as I don't recall them being on previous lists, many are just building their homes now, and the Campbelltown Local Government has not been as engaged as Liverpool. I hope that they have been given the respect of ample opportunity.

Residents have also not been given a proper scale model or complete picture of what this proposal will look like especially from Wattle Grove or from Casula. This would be necessary to help residents envisage the heights and impacts of such a facility. Even the picture given on the front of the EIS is skewed and avoids showing the nearby residential area.

More than half of the population in the surrounding area speak a language other than English at home. Liverpool LGA boasts that it's residents speak 140 languages – I am positive that this proposal has not been seen or accessed by a significant proportion of our community.

Indigenous stakeholder consultation is outlined in 5.2.4 of the EIS where it seems as though the local Gandangara Aboriginal Land Council may not have been consulted. As consultation with the Aboriginal community began in 2010 I would see this EIS as lacking if Gandangara were not included.

### **SIGNIFICANT CONCERNS:**

This proposal has several significant concerns. These include (in no particular order) an increase in air pollution, a negative impact on our local roads, noise pollution, light spill, environmental and heritage concerns, and the opportunity cost of the land creating fewer jobs than otherwise envisaged.

#### **Air pollution –**

This is my major concern as adding pollution to this area could have very real and significant health impacts.

The EIS has stated that their project is likely to “slightly increase some concentrations of air pollutions along roads near Moorebank” and on the “western part of the rail corridor from Port Botany to Moorebank” – both mean a worsening of air quality locally.

SIMTA's EIS stated that health impacts may only occur from the intermodal activities if a person was outside for longer than 90 minutes. The NSW Government encourages a healthy lifestyle, in fact the Office of Preventative Health has been opened in Liverpool to highlight the need for people to be healthy and active, particularly in this area. Yet their health may be at risk if they are outside for the length of a game of soccer. I can't stand to think of what our children may be subjected to breathing in during their lunchbreaks at the nearby schools and childcare centres and the long term impact it may have on their development and health.

The EIS already states that “exceedances of the regulatory guidelines has already occurred during bushfire and dust storms”. Unfortunately these both occur too often in this vicinity.

While monitoring will be continuous during construction and operation, what happens if it does exceed safe levels? Will the operation be closed down until it returns to normal? How quickly would that happen? How long would freight remain unattended if the operations were suspended? How could we be sure it wouldn't occur again? Much of the EIS talks about potential mitigation measures and yet no real solutions are offered.

### **Roads –**

The EIS states that “at present, a number of roads close to the project site are known to experience congestion”. This proposal does nothing to alleviate this situation and will likely add to it becoming worse, as it also mentions that “some additional heavy and light vehicle trips would be generated ... at local road intersections in the vicinity of the Project site”.

This EIS doesn't mention the idea of relocating Moorebank Avenue for local traffic as has been publically suggested. This needs to be given to the community for their consultation. Consultation also needs to occur for the idea to use an upgraded Glenfield Causeway to connect to the Hume Hwy.

Moorebank Avenue is currently utilised as an alternative for local traffic to avoid the M5 and the Hume Hwy. Should it be congested by the intermodal this traffic would be an additional burden to the already busy highway. This already occurs when the Glenfield Causeway is closed due to flooding which causes traffic chaos.

Should the Army entrance on Moorebank Avenue be blocked or closed, additional pressure would be put onto Heathcote Road. This occurred for a period of time earlier this year and caused major traffic gridlock.

Has the idea of placing the entry to the site at the northern end of Moorebank Avenue been considered? This would enable all the vehicle traffic to leave Moorebank Avenue as soon as possible and give it back to the local traffic.

Other questions should be raised such as to how the staff will get to and from the site. SIMTA was considering rerouting local buses for their own convenience and had suggested their staff could utilise the parking at Holsworthy train station – I trust that the same has not been considered by this proponent.

The EIS states that a few road upgrades around Moorebank Avenue will enable this project to have minimal impact on residents. At its peak the project looks to be introducing 5,724 cars and 8,160 heavy vehicle weekday trips to and from the MIT. This is a massive concern. This year, 1100 construction vehicles were introduced at the Holsworthy Barracks on Heathcote Road - just down the road from this proposal. This added 40 minutes each way for commuters to drive from Wattle grove to Holsworthy – just one suburbs distance. I can't fathom the impact of an additional 5,724 cars and 8,160 heavy vehicle trips on our lifestyle.

It is stated that the aim is for onsite construction to occur from 7am to 6pm on weekdays and 8am to 1pm on Saturdays, and yet one of the key design and mitigation measures proposed is to minimise “construction vehicle movements during peak periods”. The arrival and departure time of the construction workers coincides with our peak times for local commuters to travel to and from work in the city – as happened with the Army Barracks.

Another mitigation measure is to monitor “traffic in peak periods on Moorebank Avenue during Early Works and construction to ensure queuing at intersections does not impact on other road users”. This does not actually avoid the problem though, or outline what would happen should the situation occur.

Originally it was thought that the more industrial areas of Chipping Norton and Moorebank would take containers and freight for storage. If this is still the case then it would also add to the traffic and congestion on local roads.

The MIC state that traffic congestion can cause health impacts such as stress and anxiety but believe that the project will have net positive impacts once mitigation measures are implemented, and because upgrading Moorebank Avenue will reduce heavy vehicles in the wider network – but this does nothing to assist our local residents who are likely to be subjected to more local pinch points and congestion.

#### **Noise –**

The nearest homes are 200m from the western side of the MIT site. There is no doubt that this will cause additional noise to these residents.

Differing figures are given for the number of expected train movements. One section suggests 303 a week and another gives 317. Will there be a curfew to give the nearby residents some uninterrupted rest? How long does a locomotive of approximately 1.8km take to go past a house? Surely the noise from that would potentially disturb the sleeping patterns of the neighbouring residents. I have stood on the grounds of the site for a School of Military Engineering ANZAC Day service and heard the commuter trains as they went past at approximately 6:30am. Heavily laden freight trains, 24 hours a day, seven days a week could very well be unbearable for some residents – particularly when wheel squeal cannot be avoided.

It is anticipated that construction will take place between 7am – 6pm weekdays and 8am – 1pm on Saturdays, except for the many activities that may be required outside these standard hours. It is predicted that the noise levels at Casula, Wattle Grove and Glenfield will have noise levels exceeding the NMLs at times during the construction period, triggering “the need for reasonable and feasible noise mitigation measures.” These activities may impact on residents for months or even years. They should have been informed before the EIS consultation period as to how often work may be undertaken out of standard hours, how long it will last, and how the noise will be minimised. Will they be given any kind of window treatment for noise or other compensation from what may be years of significant disturbance?

During operation, residents of Wattle Grove and Casula may suffer with “occasionally” having the noise assessment criteria exceeded – on days with average meteorological conditions. How is often is “occasionally” and what will be done to mitigate that noise? What will be done to mitigate the noise that may occur during adverse meteorological conditions, which can cause disturbances during early mornings and night times during the winter months? This terminal is not surrounded by industrial sites, but by families who should expect the right to the peaceful and quiet enjoyment of their homes.

It appears that night-time noise mitigation modelling was not successful at Lakewood Crescent, Casula. I would call for more receptors to be placed in other locations nearby to see the extent of the area that would not be supported. This is not good enough for these residents – especially as the MIC notes that “noise can have a range of health impacts such as sleep disturbance and cardiovascular health problems”.

The idea of scheduling more traffic movements to occur on the M5, outside of peak periods, when congestion is less likely to occur would likely lead to more evening and night time noise and disturbances for nearby residents.

#### **Light –**

The construction period may cause light spill and disturbances to nearby residents. MIC says that they will be notified well in advance, but that does not necessarily solve the problem for these neighbours. How can it be mitigated or the residents be assisted during these times? How long would the impact last?

I notice the MIC say they propose to contain construction lighting within the area of actual works but they only aim to “avoid light spill to surrounding areas as much as possible”. While this is helpful, it doesn’t stop the light spill or disturbances that can be caused and some impacts may be high during construction.

During operation, should the north or central options be chosen then we need to rely on the train drivers not using their high beam lights so that they do not shine them directly into the neighbours opposite. This could potentially raise other safety issues though and it does rely on the drivers to operate differently here.

Some residential areas could also experience a “noticeable change in the brightness of the area on clear nights”. It is unlikely that this could be mitigated.

#### **Environment –**

Much of the lauded conservation area is in the flood zone for the Georges River. Surely our fauna need more than that area to survive future floods. With the significant amount of development that has taken place nearby recently, our local flora and fauna habitat is diminishing. This includes at the Holsworthy Army Barracks, and at Georges Fair, Voyager Point and Pleasure Point. There is also the SIMTA Intermodal proposal on the adjoining site and the significant housing proposal at Heathcote Ridge, West Menai that would further reduce the area.

There is important biodiversity on this site and threat listed ecological communities that are important for habitat connectivity.

Grey-headed Flying Fox also exist in the area and are having their habit reduced all around them.

Although the EIS states that there are no threatened flora species present or with potential habitat west of the Georges River within the expected construction footprint of the rail access connection options, there may very well be threatened species that could be affected by the vibration, noise and disturbances caused by the project.

Cumberland Plain Woodland is supposed to be protected and yet both the SIMTA proposal and the MIC have not placed importance on this species.

The MIC EIS outlines that there are potential impacts “during operation that include fauna injury or mortality, disturbance to habitat and noise, light and dust disturbance” and yet they aren’t considering further assessment or developing mitigation measures until the detailed design phase and future approval assessments. This should surely be considered as part of the initial consideration process.

As a former military site, how will this land be safely decontaminated, especially in regards to the buried wastes and leaks from stored or used hazardous chemicals and fuels and asbestos containing materials. How can the community be assured that these concerns will be handled in the correct manner?

### **Heritage –**

The site has three scarred trees of possible Aboriginal origin and three potential archaeological deposits and three archaeologically sensitive landform types also defined. It is concerning that all three options for rail accesses potentially have archaeological deposits.

This EIS does not seem to give as much detail on potential Aboriginal heritage sites as the neighbouring SIMTA EIS, especially at the Southern access in which both proponents have an interest. I suggest the SIMTA information be read in conjunction with MIC’s proposal.

I am disappointed that some items of European heritage significance would be lost and that some would only be relocated to Holsworthy Barracks in part.

Giving approval to clear the remaining buildings as part of the Early Works may be “jumping the shark” before full approval is given. This is heritage we will not be able to resurrect or replicate elsewhere.

I have toured the School of Military Engineering site – it is incredibly special and meaningful to those who have served our country, and their families, and I am saddened that the MIC would risk this important history.

The SIMTA EIS goes into further detail about local heritage sites and how they may be impacted, such as the treasured nearby Collingwood House.

## **Jobs -**

The proponent suggests that the jobs created will be a benefit to the community. I am focused on job creation and opportunities for people in my electorate, and find it unfortunate that this proposal creates fewer jobs than if it were to revert back to its original intended use of a business and technology park. While MIC highlight that the project site “has not been selected as a business park” it was before the focus changed for this use.

The EIS shows that Liverpool LGA has greater levels of socio-economic disadvantage than the Sydney and NSW average, and “potentially a higher vulnerability to socio-economic impacts associated with the project” as a high proportion of our residents speak a language other than English at home, have “high levels of unemployment, mortgage stress, and single parent families, and lower median incomes”.

With this in mind, I find it surprising that an intermodal facility would be considered to be the best use of this land. A better option would be for it to revert back to its former designation of a business and technology park – which would have created more jobs than the 2173 jobs this will create.

## **ALTERNATIVE USE FOR THE SITE -**

This land would also make an ideal location for a training and higher education precinct as it is very close to Casula train station. Housing, restaurants and retail would also be more appropriate here as it would take advantage of the under-utilised and beautiful riverside location. Instead of blocking access, these uses would fit in with Liverpool Council’s goal of reclaiming the riverfront for the community to use and enjoy as it has been all across the rest of the river front.

## **LOCATION OF RAIL ACCESS –**

The proponent is yet to decide if they are seeking rail access from the north, centre or from the south of the site. This also adds to confusion in the community. Each option has negatives and will have impacts on the area.

### **The Northern Option**

This option would “permanently affect an area referred to as the ‘Northern Powerhouse Land’, as it would need to be occupied during construction – the EIS doesn’t state why it would be permanently affected.

Powerhouse Road would apparently need to be realigned with the northern and the central option. I would like to see some detail for this to see if it will go closer to homes or cause any other unanticipated impacts.

The Northern option also has a potential archaeological deposit on it – how would this be protected?



The visual impacts on nearby properties may also be more prominent from this option compared to the others. The locomotives may need to consider not using high beam lights when leaving the sight as they may shine directly into homes in Casula.

This option may also cause daytime, evening and night-time noise levels for Casula households to be exceeded by up to 17 dB(A). This would be a horrible burden on their lives, especially considering they are the closest to the noise of the M5 as well. Unmitigated noise level exceedances from “rail operations on the northern rail access connection were predicted to exceed sleep disturbance objectives in some locations in Casula” as well. How would this be addressed?

Liverpool Council is reclaiming much of the river front with a view to opening it up to the community for walks, bike riding and the like. This option cuts the Casula Powerhouse from being part of that ideal.

With this option there is also the concern of a potential disruption to the Barefoot Water Ski Club on the Georges River. This is one of the top five locations for Barefoot Water Skiing in the world. It hosts international competitions and trains athletes that are competitive in international arenas. We would need to know how they would be impacted, and how long for, as this is not a sport that can be easily temporarily relocated.

#### The Central Option

This option would “permanently affect an area of Commonwealth land on the Western Bank of the Georges River, referred to as the Hourglass Land and may temporarily affect land within the Glenfield Landfill Site”.

It would also impact on areas of potential archaeological sensitivity on the Western Bank of the Georges River.

Light may also be an issue at this option and the locomotives may need to consider not using their high beams so they do not shine them into nearby homes.

#### The Southern Option

The southern option is the one that would be needed if the neighbouring SIMTA were to be approved (it currently has Concept Approval) or if it were to be a Joint operation (as announced on December 5). I am unsure as to why the southern option would still need to be the preferred option if it were to be one intermodal site as surely any option would work.

There is a high potential for contamination to exist on land affected by the southern option as it needs to utilise the Glenfield Landfill site, potentially exposing contaminated fill, soils, groundwater, leachate and landfill gases.

### **ANNOUNCEMENT OF ONE SITE:**

During the Exhibition period for this EIS the Federal Government announced that they are supportive of one combined site, bringing SIMTA as the operator for a project dealing with local and interstate freight.

While disappointing that this decision and announcement were undertaken during the consultation period for the MIT, the joint endeavour needs to be placed on exhibition again as there are differences between the two EIS submitted and there will also be different impacts, especially in regards to noise, from one super site.

The EIS may also consider the rumoured need to relocate Moorebank Avenue, should it be one site, as well as the potential impacts that may have on local residents.

The MIC EIS states theirs and the SIMTA project “are entirely separate” and this one relates only to their project.

### **CITIZEN’S JURY:**

The idea of a citizen’s jury to decide how to spend \$1m from the Federal Government or the MIC was insulting to the local community. The fact that there are so many negatives that they thought they could trade them with a \$1m positive was laughable. This \$1m package of “direct benefits” for selected “people living near the terminal” to offer submissions on will only lead to spending with recurrent problems for the council or the government. It was also reported in the local paper that people had been invited who live as far as 10km away from the site. If you are going to do something to assist, at least ask people who are affected. This should not have even been included as part of the EIS as it was simply a distraction.

### **CONCLUSION:**

I find it galling that the MIC consider it an appropriate trade off that “any increase in congestion (locally) ... is expected to be offset by the significant wider network benefits, especially around the Sydney / Port Botany area”.

It is not appropriate that this community suffer so that traffic can be eased elsewhere.

The EIS states an expected increase in “some concentrations of air pollutions along roads near Moorebank” and on the “western part of the rail corridor from Port Botany to Moorebank” – both leading to a worsening of air quality locally. For this project to be legitimately considered we need to stop promoting regional benefits and instead look at what we may be doing to the health of people by going ahead with this project.

There are so many concerning impacts to the health and amenity of our residents with this location. The alternate sites need to be legitimately considered.

The submission mentions that a scoping study was undertaken as part of the Feasibility Study and that this indicated that the Moorebank site would have “a positive impact on national productivity and long-term public benefits associated with reducing road congestion from heavy vehicle freight transport, and the associated environmental and social impacts of this congestion.” The Australian Government was committed to proceeding “subject to planning and environmental approvals”. I submit that now that the EIS and community consultation has been undertaken, this project no longer has merit. There are far too many negatives to this local community than are outweighed by the few positives.

While the site is well located to move freight by road and rail, it is also surrounded by residential communities and these people should not be overlooked in the quest to find an “easy” location. Other sites, such as developing a larger terminal at Eastern Creek, or building an alternative site at Badgerys Creek would be far more appropriate and should be investigated first.

It is certainly not ready for approval to be given for Early Works to be undertaken before other concerns that may significantly impact on the community have been addressed.

Sincerely,

Melanie Gibbons  
State Member for Menai.