

Mr Ned Ticic
9 Segefield Place
Casula NSW 2170

7th December 2014

Moorebank Intermodal
Suite 2, Level 27
1 O'Connell Street
Sydney NSW 2000

To whom it may concern,

**Re - Moorebank Intermodal Terminal Environmental Impact Statement dated
1 October 2014**

I am resident of Casula (for the past 12 years) and strongly oppose the Moorebank Intermodal Terminal development.

I make the following comments for your consideration in relation to the EIS report dated 1 October 2014, with particular attention to; visual impacts, rail noise and road noise impacts on Casula residents.

Section 2-4 Parsons Brinckerhoff Report - last paragraph

- The area west of the George River (and to the proposed site) is already residential housing and not 'mark a transition to'. The Casula Links estate was developed back in the 1970's and is a well-established enclave of residential housing.
- There is hardly any commercial developments in Casula between the Georges River Bridge and the Hume Highway (with the exception of a small number of retail properties along the Hume Highway).
- Community facilities are' Casula Powerhouse Arts Centre & All Saints High School (which fall between the Georges River and Hume Highway).
- The nearest residences to the Project Site including the Rail Access points is 40-50 metres.

Refer to Page 28 Table 6 of SLR Consulting Australia Report.

Rail Access Options

I refer to Pages 7-11, 12 & 13 of Parsons Brinckerhoff Report shows Figures 7.4, 7.5 & 7.6 being the 3 rail crossing options of Northern Rail Access, Central Rail Access and Southern Rail Access.

The report eludes that one of these 3 options will be adopted. However, this is misleading as Page 7-26 Heading Rail Connections states – “The southbound rail connection from the SSFL (South Sydney Freight Line) to the Project site would be required irrespective of which rail access option is selected.

The paragraph goes on further to say that this is connected with the interstate terminal which would also use the northbound rail connection.

These cross river freight rail connections to the SSFL would serve both the IMEX and the interstate terminals.

This recommendation of the southbound rail connection is not clear from the outset!

Casula Powerhouse Road

I refer to Page 7-30 Parsons Brinckerhoff Report Section 7.9.3.

- Construction of either a northern or central rail access point would significantly affect the community accessing the Casula Powerhouse. **Have the impacts of this disruption been assessed?**
- This road is already new and moving it further west would have an addition negative noise impact on local Casula Residents. **Have the impacts of this move been assessed?**

The proposed southern rail access point does not have these issues as it stands further south of the Casula Powerhouse.

Visual Impacts

I refer to Page 2-15 Parsons Brinckerhoff Report top paragraph.

- Many residential properties in Casula Links estate due to its topography (elevation of 30 -40 metres above the river) will have visual impacts stemming from the Project site.

What mitigating strategies have been offered? How would they be enforced?

I refer to Page 22-8 Parsons Brinckerhoff Report Figure 22.2.

- The viewpoints selected for the Casula residential area (notably location 5 & 6) are not reflective of the topography as they are located to low and closer to the River.
- Higher up locations such as on Marsh Parade and Dunmore Crescent are 'real life' examples of what Casula residence would see – i.e. real visual impact. These houses back onto Carroll Park.

Why have these higher residential location points not used?

I refer to Page 22-14 Parsons Brinckerhoff Report Figure 22.3.

- Clearly shows that Casula residents are highly impacted on the visual front being moderate to high. Again, I refer to March Parade & Dunmore Crescent.

Why does the report not include a high impact category? Is there no residential dwelling in the high range?

I refer to Page 22-17 Parsons Brinckerhoff Report paragraph 2.

- I quote, "The greatest visual impact of the Full Build development would be the public parks and residential developments situated on the elevated topography sloping west from the Georges River, as well as the residential properties backing onto the SSFL."

What mitigating strategies have been offered? How would they be enforced?

Again, Figure 22.6 is misleading – as the comparison photograph was taken lower down in Carroll Park. Had the visual been taken at the top of Carroll Park on Marsh Parade (entry to the park) the visual effect would have been more contrasting.

Why was a comparison photograph not done at Marsh Parade?

I refer to Page 22-17 Parsons Brinckerhoff Report last paragraph.

- Clearly the least visual impact for Casual residents adjacent to the SSFL would be via the use of a southern rail access point or indeed the central rail access point.

Why has this not been recommended?

Again, Figure 22.11 clearly shows the visual impact to residents adjacent to the SSFL. These residents currently have no visual mitigation from the existing SSFL (which was recently constructed).

I refer to Page 22-21 Parsons Brinckerhoff Report third paragraph.

- Visual impacts would also stem from the freight trains such as headlights and from rail signalling lights.

What mitigating strategies have been offered? How would they be enforced?

I refer to Page 22-22 Parsons Brinckerhoff Report last two bullet points.

- Freight trains leaving IMT on both the northern and central rail access crossings would have headlights directly impacting Casula residents on the west side of the River.
- Figure 22.12 on Page 22-24 indicates the highest vertical illuminance readings of any of the selected residential locations.
- High beam lights from freight trains could result in illuminance readings as high as 8.8 lux.

What mitigating strategies have been offered? How would they be enforced?

Clearly the northern and central rail access crossings are far from ideal when related to visual impacts on Casula residents.

I refer to Page 22-27 Parsons Brinckerhoff Report last bullet point.

- Too hard basket. We will let someone else come up with a design to mitigate the visual impacts on the northern rail access.

Why has NO mitigating strategy been offered at this point in an EIS? A promise to look at it down the track is no good enough.

I refer to Page 22-30 Parsons Brinckerhoff Report table 22.9.

Clearly a northern rail access option has the largest impact on Casula residents. It should be scrapped as an option.

Noise Impacts

I refer to Page 12-16 Parsons Brinckerhoff Report Figure 12.1.

- It was stated on page 2-13 section 2.4.4 paragraph one that the suburbs of Casula, Glenfield and Wattle Grove contain a number of potentially sensitive receivers.
- In Figure 12.1 only one receiver in Casula was chosen (L9).
- The receiver L3 Todd Court, Wattle Grove is akin to Lakewood Crescent, Casula.
- Buckland Rd, Casula is neither near the northern rail access crossing nor the central rail crossing.
- Northern rail crossing ideal is Lakewood Crescent or St Andrews Boulevard.
- Central rail crossing ideally would have been Marsh Parade or Dunmore Crescent.

Why was Buckland Road, Casula the only noise monitoring location?

Lakewood Crescent is an ideal location to measure noise levels. The location is on the SSFL, next to the M5 Motorway and at the foot of the proposed northern rail access crossing.

Lakewood Crescent, with similar characteristics to Todd Court, Wattle Grove given the proximity to M5, would have shown higher readings for both RBL and Ambient Noise.

Casula is highlighted throughout the EIS as most effected by impacts yet 1 monitoring position was used.

On page 12.12 Parsons Brinckerhoff Report last paragraph.

- The RNP requires that the Project not increase existing noise from the M5 Motorway as at position L3 already exceeds traffic noise criteria.

Firstly, the majority of heavy vehicle traffic will be west of Todd Court, Wattle Grove, this noise level increases are minimal.

Secondly, traffic westbound on the M5 from the Moorebank Avenue to Hume Highway will increase significantly as this was the purpose of the IMT in Moorebank to service outer western Sydney.

Therefore, with noise levels for Lakewood Crescent, Casula at (or more in my opinion) to that of Todd Court, Wattle Grove – **What would the traffic noise increase for Lakewood Crescent be? What modelling has been done? Would it in fact be more than 2 dBA – and thus breach the Projects own traffic noise policy.**

I refer to Page 12-16 Parsons Brinckerhoff Report Table 12.13.

- Casula has noise levels predicted above criteria for all rail access crossings during construction phase.

With houses within 50m of the rail crossings, what mitigation measures have been offered? How would they be enforced?

I refer to Page 12-19 Parsons Brinckerhoff Report Table 12.16.

- Casula has noise levels predicted above criteria for all rail access crossings during Phase B operation – neutral meteorological condition.

With houses within 50m of the rail crossings, what mitigation measures have been offered? How would they be enforced?

I refer to Page 12-19 Parsons Brinckerhoff Report Table 12.16.

- Casula has noise levels predicted above criteria for all rail access crossings during Phase B operation – without mitigation.

At Lakewood Crescent noise levels are predicted to exceed evening noise criteria by 9 dBA and the night time criterion by 5 dBA. These are significant numbers.

With houses at Lakewood Crescent, Casula within 50m of the rail crossings, what mitigation measures have been offered? How would they be enforced?

Similar readings would be made for parts of St Andrews Boulevard, Phoenix Crescent and Westchester Avenue.

I refer to Page 12-26 & 12-33 Parsons Brinckerhoff Report Table 12.20 & 12.22 respectively.

- Lakewood Crescent & St Andrews Boulevard would have predicted daytime noise levels exceeding 2 dBA, evening noise by 11 dBA and night time noise by 17 dBA.

Psychophysical experiments show that subjects report as doubling of loudness for each increase in sound level of approximately 10 dB. Roughly speaking, 50 dB is twice as loud as 40 dB.

What does mean for Lakewood Crescent & St Andrews Boulevard Casula residents?

I refer to Page 12-35 Parsons Brinckerhoff Report Table 12.23.

- Lakewood Crescent & St Andrews Boulevard would have predicted maximum noise levels of 83 dBa and 86 dBa which is above the sleep disturbance objective of 80 dBa.

Why is the northern rail access crossing even an option?

A detailed assessment of sleep disturbance impacts has yet to be undertaken.

What mitigating strategies have been offered? How would they be enforced?

Southern Sydney Freight Line (SSFL)

I refer to Page 12-36 & 37 Parsons Brinckerhoff Report Table 12.24.

- SSFL has not provided any noise mitigation measures to the residents in Casula adjoining the SSFL. Noise walls were only provided to those residents on the east side of the existing railway line.

SSFL should provide noise receptor information to MICL for houses along Lakewood Crescent, St Andrews Boulevard and Buckland Road.

Further, the link to ONVMP does not work. Neither does the SSFL website.

www.ssfl.artc.com.au/approvals

Road Traffic Noise

I refer to Page 12-37 Parsons Brinckerhoff Report Table 12.25.

- The largest impact to road noise for Casula residents will be on the M5 Motorway.
- Buckland Street, Casula is not the ideal location for road traffic noise. There are roads closer to the M5 Georges River Bridge that should be considered.

Again, what is the noise impact for Casula residents in Lakewood Crescent and St Andrews Boulevard? Would it be greater than 2 dBa? Why was this not measured? What about road noise levels for Congressional Drive Liverpool?

I refer to Technical Paper No. 2 Appendix B SLR Consulting Australia Report.

- Location 5 should read Buckland Road, Casula not Wattle Grove.

The M5 road between Hume Highway and Moorebank Avenue is already congested. If it continues then the report suggests the Project I refer to Page 11-46 Parsons Brinckerhoff Report paragraph 2.

- The M5 road between Hume Highway and Moorebank Avenue is already congested. If it continues then the report suggests the Project Operator expand operations to work outside peak periods for road traffic.

What impact would this have on road noise levels for Casula residents i.e. M5 Georges River Bridge.

Why are there no Noise Walls proposed for the M5 Georges River Bridge?

This is the busiest part of motorway on the entire Sydney Orbital network and no noise walls. With the MIT Project it would become perhaps the states busiest motorway!!

Noise Mitigation

I refer to Page 12-46 Parsons Brinckerhoff Report Section 12.4.4.

- The largest impact for Casula residents is indeed the northern rail access crossing.

Why is it even an option when all noise cannot be categorically mitigated?

I refer to Page 12-47 Parsons Brinckerhoff Report Figure 12.5.

- It looks like the whole site require noise mitigation because of residents to the west in Casula – **Why the hell is this site in Moorebank ideal?**
- No noise walls are proposed for the interstate rail track. **WHY NOT?**

The proposed noise protection walls in figure 12.5 is a clear admission that the entire MIT is noisy and a visual eyesore for Casula residents.

The residents along the SSFL already have sleep deprivation with 3am freight line wake up calls. The M5 motorway has nightly heavy vehicles under compression brakes. The entire Casula links areas along the Georges River from the M5 Motorway to Casula Powerhouse is a nightmare.

Despite all the proposed and yet to be determined noise and visual mitigates the Government cannot guarantee that every resident will NOT BE WORSE OFF.

Clearly. Casula residents will be significantly worse off. More heavy vehicle traffic between Hume Highway and Moorebank Avenue means more compression braking; more freight movements along of SSFL means more

freight train noise; freight train line over the Georges River means negative visual impacts with headlights and traffic signals; Container terminal that will be seen from the tops of Casula means day and night time negative visual outcomes.

Unless the MIT is put underground or covered by a massive canopy I cannot see how any mitigation will work for Casula.

I refer to Page 12-54 Parsons Brinckerhoff Report last bullet point – mitigation measures (using receptors in this report which are not ideal) would still not cover ALL residences.

I ASK YOU WOULD ANY OF THESE NOISE & VISUAL IMPACTS BE RELEVANT SOMEWHERE ELSE WITH NO RESIDENTIAL DWELLINGS NEARBY I.E. BADGERYS CREEK?

Regards,

Ned Ticic

7th December 2014