

EAST LIVERPOOL PROGRESS ASSOCIATION

President: Mr. M. Byrne 0414 978 694
Secretary: Mr. M. Frew

PO Box 47
MOOREBANK NSW 1875

22nd August 2016

Public Submission Response to :
Project SSD-5066 SIMTA Modification : Moorebank Precinct West
Concept Plan and Early Works Modification
Section 96(2) Application to Modify SSD 5066

Dear PAC Commissioners,

We write to submit our objection to the SIMTA request to extend its Early Works approval to include and cover the entire Moorebank Precinct West (MPW) site.

We refer you to our original submission referenced as Response 208 in the Response document from MICL , and our submission 26th June 2015. (hereunder)

We open our address to the Commissioners with the penultimate paragraph of the 26th June 2015 submission:

It is incumbent on the proponents to lay out up front, before a spade of soil is turned, how they will address the major infrastructure demands of the location and its limitations for the development to attain its planned economic return that is used to justify the extensive disruption to the amenity of local neighbourhoods and river lands.

The Planning and Assessment Commission placed specific "transport capacity" conditions on the Concept Plan Approval - to be precise **"....it must not exceed the capacity of the transport network "**. This was received with satisfaction by the local public as a recognition by "the authorities" that their voice was being heard.

We understand that formal studies involving traffic modelling are under way and that a Transport Impact Statement is to be released. There will be much public scrutiny on this statement along with the modelling feeding into it. The application of our local knowledge of the site's limitations is enhanced with having professional transport modellers as "locals."

The MPW site comprises 220 hectares of vast Cumberland Plain Woodlands. It includes 25 metres of riparian ground of the Georges River. It includes sizeable undulating lands back from the river to Moorebank Avenue, MPW's eastern boundary. We understand that a portion of these lands towards the river will be reserved as open space.

The nature of the development will see the balance of open woodlands transformed to levelled out "tar and cement" to meet the demands of heavy haulage vehicles, freight cranes, freight container trains and warehousing to process 1.05 million TEU at the combined MPE and MPW sites.

This indicates that the "early modification" works will transform this 220 hectare open space into industrial use.

Our objection rests on this fact. Concept Planning approvals to date are specific concerning the limitations of TEU throughput being attached to the transport system capacity. We submit that this limitation must extend to the approvals for Early Works given their transforming and irreversible nature.

In closing, we note that in the Qube Holdings public references to the "Moorebank" development they state they have gained "planning approvals", with an occasional reference to unnamed conditions.

A further note. Articles in the AFR and The Australian have named Mr Chris Corrigan as identifying Moorebank as a potential freight terminal site. He viewed the lay of the land from his helicopter. Mr. Corrigan since 2007 has steered Moorebank as a Qube project. It is now a solely owned Qube development.

Mr. Corrigan would have done well to scan from his helicopter across the expanse of the Liverpool Military Area. He would have observed there were no other roads south of Moorebank directed to the east. Hence Moorebank being the sole river bound traffic corridor to the fastest growing region in Sydney, and thus cancelling out, and beyond, the advantages of proximity to the public funded M5/M7 and SSFL transport assets.

Thank you this opportunity to engage in this important consultation.

Yours sincerely



Michael Byrne President 0414 978 694

Attachment : Previous Submission - 26th June 2015

At this time we limit our comments to the following but foreshadow specific explication at any future public consultation process.

In both the original EIS, and this latest document in response to submissions, the project (SSD-5066) is represented, for the purpose of its ultimate justification, as having location benefits that are unique and will carry high economic return to become a highly valuable national infrastructure asset once fully developed.

In factual, measured and argued submissions in response to the original EIS of project (SSD-5066) the location of Moorebank in East Liverpool is exposed as constrained with its unique geographical and land use limitations - a major Western Sydney regional traffic corridor, bridge reliant with river on three sides, Liverpool Military Area running 20 km to its immediate south - to destine it as a high cost / low return sub developed freight hub venture.

We make one specific reference to the published MIC Response to Submissions - Page 92. It makes reference to our submission(# 208) wherein we raised "(P92)... concerns in relation to the staged approval process and argues that environmental impacts should be assessed upfront".

This is an insulting conclusion. That particular "concern" was expressed by us in our submission with the following.....

Using staged approvals "will be a dereliction of duty as local knowledge highlights for all to see the obstacles ahead and that no engineering can remedy the volumes of traffic into which the 1000's of daily truck movements need to merge and then wind out to their destination.....The project is a major infrastructure development and must be fully implemented as modeled and planned to attain a positive return for the major investors. Unless it proceeds to its fullest planned intention then it is to be condemned as half baked... "

The concern was not of "environmental impacts"... It was directly that delaying until stage 2 the requirements and costing of infrastructure to address the observable limitations of the site and measured shortcomings of existing traffic flows will see the project be one of limited returns for all concerned.

\$9 billion seems to be a national interest figure that justifies captains of industry and politicians to establish, without concern, a 24 hour seven day dirty and noisy industry in the close vicinity of established residential neighbourhoods and river bank reservations.

It is incumbent on the proponents to lay out up front, before a spade of soil is turned, how they will address the major infrastructure demands of the location and its limitations for the development to attain its planned economic return that is used to justify the extensive disruption to the amenity of local neighbourhoods and river lands.

Thank you for the opportunity for us to present this view on behalf of our local citizens.

***** End of Submission *****