

22 August 2016

To Whom it May Concern,

**Re: Objection to the Moorebank Intermodal Terminal Stage 1 Early Works (SSD 5066 MOD 1) proposal**

I am still gob-smacked at how any proposals for an Intermodal on this site at Moorebank have been given approval, as they will have serious detrimental impacts on a whole community. No benefit to our city or State could possibly be worth the risk to human health, the environment and to our amenity. I ask that you keep this in mind when assessing this next stage of application.

From the point of view of the community, this was an unexpected proposal. I'm not sure it could have been unexpected by the proponents. The capital investment value of the proposal is \$7,590, 000 (incl GST) and so that could surely not have been unanticipated from the start.

This is either a modification to fix up sloppy work by the proponent or it is a change by stealth as they would surely have been aware that they were asking for way too much, with too great an impact, in their first proposal.

I am yet to work out if it is more likely to be sloppy work or the opportunity to make incremental changes by stealth.

It could be sloppy – after all, the original Environmental Impact Statement for the Concept Plan Approval has that “imported fill volumes” would be “relatively minor” and yet, now we are told an estimated 1,600,000 cubic metres will be required to be imported.

It makes me question how many other errors have been made – after all, we have already been told that more roads will now require upgrading to make the project possible (when we were practically laughed at for suggesting these roads at the community consultation stages). Can their pollution and noise levels be trusted? Can their reports into the heritage and environmental impacts be relied upon? A few mistakes here and there could have drastic consequences on our community down the line.

I note that more vegetation removal is now apparently necessary. What impact will that have on the environment in that area?

There is a request for a massive increase in hours to now include 6pm-10pm on week days and 1pm-6pm on Saturdays. This means that there would now be noise and traffic impacting our community from 6am – 10pm on a weekday and 7am-6pm

on a Saturday. That is a massive increase in hours. When is our community supposed to have a break or a chance for some peace and quiet? It needs to be remembered that people lived in this vicinity, before this site was proposed for a freight terminal.

The proposal also admits that other construction works associated with the Modification Proposal may be taken outside of these hours. No one minds movements to deal with safety concerns or to prevent harm, but I do take issue with “works which do not cause noise emissions to be audible at nearby sensitive receptors” and with “any other works as approved through the Construction Noise and Vibration Management Plan”. Fair is fair.

The construction period is intended to take six to nine months. That is a long time for locals to be subjected to these hours and additional disruption from truck movements.

The map provided on page 3 of the Modification Proposal doesn't really show any of the homes to the east of the site and it also doesn't show the full extent of the homes to the west/south west of the site either. It could give a misleading view of the true impact.

This work is apparently intended to start in the last quarter of this year – I believe this puts undue pressure on the assessment of the proposal. Assessments and the chance for the community to have their say, should not be rushed but given due time to make an accurate and fair decision.

Why is the construction period estimated at six to nine months? I can't imagine many projects need to build in a 50% margin into their time frame.

Have the daily truck movements (1,680) and the volume of fill (22,000 tonnes per day) been calculated based on the six month or the nine month time frame?

1680 truck movements a day will surely have a huge impact on our community – clogging both the M5 and the roads utilised by our locals in their day to day activities.

While only 16 trips a day are expected to utilise Cambridge Avenue each day to access the Glenfield Waste Facility, it is a serious situation that needs to be addressed and not just signed off on.

The Cambridge Avenue Bridge over the Glenfield Causeway is a road that already causes concern in the community. I have been led to believe that there have been a great number of discussions between every level of government over who owns the bridge and who is responsible for it – whilst everyone is in agreement that it is dangerous and in need of upgrading.

Adding 16 truck movements to this bridge is a dangerous proposal. It is a narrow, low level bridge that is regularly closed due to flooding.

In March just last year, the drivers in two small hatchback cars were taken to hospital with serious injuries after a head on collision.

In June 2006 a long-serving firefighter was killed when his fire truck clipped a semi trailer while on its way to the Holsworthy army base. It is reported that the semi trailer coming in the opposite direction had braked to give the fire truck more room to cross the narrow causeway but its trailer had veered out, clipping the fire truck, which smashed head on into a large tree.

Between 2004-09 Cambridge Avenue had 24 casualty crashes, with 29 injured or killed.

Surely adding another 16 large vehicles without undertaking any roadworks would be an unnecessary risk to life.

Apparently a Road Safety Audit would need to be undertaken to identify traffic safety risks or appropriate mitigation measures. Surely this should have been undertaken before this proposal was put for assessment. Who is expected to pay for any necessary upgrades or modifications?

In regards to the idea that “some light vehicles would travel to the site via Anzac Road” (page 6 of the Concept Plan Modification Proposal Traffic Impact Assessment) this would be a straight violation of a promise to the community that no vehicles would use Anzac Road as part of the activities on the site. Not only is Anzac Road utilised by local residents, it is also the home to the fire station and it is important that access is not restricted. I also note on page 10, that “no construction trucks are expected to travel via Anzac Road”. Does that mean that they will be permitted to travel that way if they wish though? What measures are being put in place to stop this from occurring?

Where is this fill likely to come from? Which roads would really be impacted? How will waiting times to get on and off the M5 in particular be impacted.

Page 7 of the MIC Stage 2 Pre-Construction Traffic Impact Assessment document has errors in the Road Hierarchy sections. Moorebank Avenue is not only a State and Local Road, but also partially privately owned on Commonwealth land. Anzac Road is not only a Local Road but also controlled by Defence and Defence Housing. Cambridge Avenue is also not only a Local Road but is partially under the Commonwealth’s jurisdiction as well (as outlined in the table above on the same page). Once again, this is surely either sloppy work or is done to deceive the reader and decision makers.

I question the figures provided on page 8 as I don’t believe the traffic on Anzac Road could be so similar to Moorebank Avenue or to Cambridge Avenue. It is still busy enough though, that additional traffic movements would be of concern.

The existing traffic peak hours are shown as being 8-9am and 5-6pm. I would have liked to see these expanded to include traffic that leaves earlier to get to the city for 9am and that leaves the city after 5pm, rather than just the “local peak hour”. How was 8-9am and 5-6pm determined? I note that it is different from the am peak provided (on page 11) of daily staff car trips, being 6am-7am, but that it would add to the evening peak.

Where does the belief that one in three workers will ride share come from? Has this been established on other sites in this area or in this industry?

I also note on page 12, table 4-2 has 96 car movements entering the site per day, but 97 exiting. How accurate can these figures be when there are errors even at this point?

Page 13 quotes that the Modification Proposal traffic contribution “in peak period is relatively small compared to the existing intersection traffic volumes” but I question which peak period is used in this assumption – the actual peak in the community, or the staff peak?

Where does the assumption that 90% of staff would travel north via Moorebank Avenue/M5 Motorway and that 10% would use Anzac Road come from? Why would no staff travel in a southerly direction?

Will there be delays to existing traffic along Moorebank Avenue whilst signalised intersections are installed or while alterations are undertaken to give “safe and efficient access” to the site?

Page 21 states that approximately 75 car parking spaces will be provided for the staff and for 20 delivery vehicles (this is the first reference I have seen to “delivery vehicles”). This is expected to provide for the anticipated peak number of workers (approx. 50) travelling to the site. But that must be assuming the shifts don’t cross over – that the car park empties ready for the next shift to take those positions? With 105 workers, I assume it also takes ride sharing as something the staff will embrace.

In regards to the volume of fill, I would question whether the additional level and height would change all the assumptions given in previous applications.

Surely increasing the height of the land will mean the containers will be higher and so possibly more seen or have a greater impact on nearby homes. If the site is higher, will that change the noise impacts down the river or on the homes further up the hill on the Casula side? Does this mean the light posts will then be higher causing greater light spill on Casula and Wattle Grove? I would suggest all these assessments would need to be re-run to ensure the community is not going to suffer from an even greater adverse impact.

I note that there is potential for slamming truck tail gates to cause sleep disturbance. Seeing as though trucks will be arriving from 6am to 10pm this could have an impact

on babies, children and shift workers. If truck tail gates are an issue, surely starting crushing at 7am will disturb the neighbours.

Table 3-10 on page 14 of the Noise and Vibration Impact Assessment also shows Casula as potentially having to suffer a 2 decibel exceedance due to the cumulative construction activities. This cannot be acceptable for this community.

I notice that during materials delivery “a scraper and water carts will be operational” to manage materials and dust generation. Will there be other measures typically found in these facilities such as wheel cleaners to stop trucks dragging materials off site?

This also leads me to question where the material for the fill is coming from. What safeguards will be put in place to ensure it is free from asbestos or other contaminants before it gets to the site – or will it be sorted there? If sorted on site, what measures will be in place to stop the spread of harmful substances throughout the local area?

Once the site is levelled, what is the plan for this facility? Will it be closed down or will it continue to operate alongside the freight terminal? Will these truck movements, noise and dust continue to impact our area?

Would this also need to occur on the neighbouring intermodal site as well? They are very similar sites and may have the same levelling issues. How much fill would they require on that much larger site? How long will the community really have to tolerate this for?

Where does this stop – when ready to build roads and facilities, will they then want to start their own concrete manufacturing or store and produce bitumen on site in order to avoid expensive deliveries? How many more seemingly small amendments will be put forward to deal with mistakes or cost cutting for this facility?

At the end of the day, with the admitted short falls in the original application for consent, perhaps it's really time to reassess the suitability of this site for an intermodal terminal.

The community really does deserve better than applications submitted to fix sloppy mistakes or being added by stealth to make this a bigger undertaking.

I ask that you listen to the concerns of the people in the local area, and reject this proposal.

Yours sincerely,

Melanie Gibbons MP