

## Objection to Moorebank Precinct West Intermodal Terminal Facility Concept Plan Approval Modification (SSD5066)

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Glenfield Farm.

This objection raises a number of points in respect of the modification plan submitted.

First and foremost, "The consent authority must first consider whether the proposed modification is of minimal environmental impact." [Environmental and Planning Law in New South Wales, Lyster, Lipman, Franklin, Witten, & Pearson, Chapter 4, Developmental Control, Lapse, Modification and Revocation, pg 109]

The potential and immediate environmental impacts of this project modification are in real terms, massive, not minor. They include flood diversion risks to residents, associated pollution risk, diesel particulate risk to the large adjoining residential population during the massive truck movements lasting nearly a year, high level noise pollution, massive damaging traffic impacts to residents, and impacts resulting from the project buildings, warehouses, and heavy equipment all being raised by two metres. These impacts are addressed below.

The developers have simply failed to address this aspect of the application, and the applications fails on these grounds. It should be rejected.

Instead, the developers focus on whether the modification application is "substantially the same as the original development." Even if planners accept the highly contentious view that in a development as enormous as the Intermodal project, a total of over two million cubic metres of fill making a two metre rise in the land level, is proportionally a small (but not minor) difference, in real terms on the ground, the modification is a major change.

Highly substantial departures from the project so described are: the importation of approximately 2,000,000 cubic metres (total across all modification applications) of questionable fill material, which will raise the level of the development by an unacceptable, and formerly unapproved, two metres and will change the flood diversion profile in the highly flood prone Moorebank residential area; six to nine months of around 1500 two way heavy vehicle movements per day; extended working hours close to residential areas; a failure to identify and address impacts of the raised site on the important visual curtilage of historic Glenfield Farm across the spur line site and the Intermodal site across the Georges River; and a major polluting, noisy and extensive crushing operation that was also not described in the MPW Concept Plan approval, and should thus cause the modification proposal to be rejected.

### 1. Flooding and associated pollution issues.

The area proposed for the Moorebank Intermodal is located on the primary floodplain for the Georges River. According to a paper entitled "Have We Forgotten About Flooding on the Georges River?" presented at the 2001 Floodplain Management Authorities Conference at the Wentworth Shire Council, planning considerations need to be made for a maximum flood, which can be up to 5 metres higher than the 100 year flood, which is 10.5 metres. [Have We Forgotten About Flooding on the Georges River? Maddocks, J., 2001 Floodplain Management Authorities Conference Wentworth Shire Council]

The paper points out that filling of federally owned land has been carried out on the floodplain apparently without as assessment of its impact on flooding. To answer the question posed by the paper, yes, the federal government and the Moorebank proponents have indeed forgotten about flooding on the Georges River. The developers of the entire Moorebank Intermodal project appear to be afflicted by selective amnesia in respect to flooding.

The Moorebank Intermodal modification proposal to raise by two metres the level of a vast area of intermodal land that is directly adjacent to the river, is a highly irresponsible measure in terms of the floodwater diversion impacts to communities downstream in the event of severe or minor flooding. It is essential that a full flood modelling study is carried out in respect of this modification proposal. If the developers of the Moorebank Intermodal hope, by raising the site, to mitigate the effects on flooding to their own operation, the hope is forlorn, given the figures above. Certainly, the army occupied the site, but the army did not run an enormous warehousing operation for other people's goods. It difficult to see how these goods can be insured, given the proximity to a large, highly flood prone river. Two metres of fill will be enough to cause damage to downstream communities, but not enough to save the Moorebank Intermodal and its access lines in the event of a very severe flood. Informed tenants will think long and hard before they commit clients' goods to such a warehousing risk scenario. There is a risk that the state or federal governments will eventually wear the indemnification costs of this project - after all, they will have approved it.

As former objections have pointed out, the Moorebank Intermodal, though it has been touted as a rail to road transfer point, an intermodal transport hub, it has gradually been revealed to be a massive warehousing operation. The risks of building warehouses next to a river, on a known flood plain with a devastating 100 year maximum flood prediction, now need to be properly assessed.

This modification proposal is far more than the correction of a minor error or miscalculation by the proponents. It is a highly invasive change to the floodplain that potentially could cause massive damage downstream. It appears to be either a scramble to attempt to mitigate the flooding risk, or an attempt to cover up the long list of pollutants either found on the site or suspected to be present, such as toxic firefighting residue. In the absence of a project masterplan which might have identified these issues, the modifications should be dismissed and the entire project sent back for proper flood risk and other assessments in a properly organised application.

### 2. Incorrect European Heritage Assessment in the Modification application.

The modification application ignores the extremely close position of historic Glenfield Farm to the spur line site, and the impacts of the modifications on the Glenfield Farm site.

The spur line proposal is across land that is currently occupied by Glenfield Waste Services and used as a waste landfill site, which so far has been used as an excuse to ignore visual impacts to Glenfield Farm, even though this landfill site is temporary and was to be remediated and returned to public use land, under the National Parks and Wildlife service control. This land remains an important part of the visual curtilage of Glenfield Farm, an historic collection of farm buildings listed as being of exceptional importance to the state of NSW. The land in question, which is zoned recreational land by Liverpool City Council, was to have been filled by Glenfield Waste Services and then returned to public use. The ownership/conditions of use situation has not been made public, but the land now appears to have been passed over for use for two spur lines, which will be highly intrusive in both visual and acoustic terms to Glenfield Farm. The interest in this land posed by Glenfield Farm and its visual curtilage has been completely ignored in this deal, which should now be exposed to proper public and planning scrutiny as part of the modification application process. Any voluntary agreement made in respect of this land should have included the interest in it held by Glenfield Farm's visual curtilage. As a freehold owner of Glenfield Farm, I was not consulted or informed about this deal, a requirement that has not been met.

The view from the rear of Glenfield Farm, which appears in the modification application (acoustic) incorrectly labelled as an educational sensitive receiver (the presence of Glenfield Farm is very rarely acknowledged in these applications, presumably lest questions be asked) is a spectacular and authentic panoramic view across bushland that looks much as it would have looked 200 years ago when the farm was built. The blight of the landfill tip, once remediated, would have returned this vista to the heritage treasure it was intended to be by Liverpool City Council and the Commonwealth.

The close visual curtilage of Glenfield Farm has been compromised without public review, from future public use land, to an industrial development, comprising huge spur lines. Now, this further modification application seeks to ruin the distant/horizon view from the heritage property, which is frequently described as a 'jewel.' The raising of the whole Moorebank Intermodal development by two metres will increase the total visibility of the development from Glenfield Farm, it will not be hidden by trees, it will increase light spill, and will increase noise transmission and air pollution from the container fumigation processes that will be carried out onsite. The application modification nullifies all acoustic and other reports that have been carried out in respect of the impacts of this site. The raising of the site is a major alteration with undocumented and major impacts which should rightly be the subject of a new development application, not a modification application.

It is fair to say that the success of this increasingly ad hoc development with its spur lines from the SSFL, is predicated on ignoring the existence of Glenfield Farm as an exceptionally important European historic site, with a historically important viewpoint across the spur line development to the Moorebank site proper. The acoustic impacts alone will cause grave issues of liveability to the property. The modification should be refused on these grounds, and an urgent report into the full impacts on historic Glenfield Farm should be implemented, as per planning requirements of this state in respect of listed historic places.

### 3. Transport issues.

The modification application attempts to portray 1500 heavy vehicle movements per day six days a week for up to nine months, as a minor inconvenience to residents.

Discussion using the alternative facts put forward by the proponents, assert that these vehicle movements and many other light vehicle movements will have only a very small impact on congestion issues in the area, and any problems will be dealt with by road upgrades that are in the early stages of planning. The proponents have frequently asserted that they intend to start early works very quickly if they gain approval, with the result that very heavy congestion issues will result, along with severe impacts on residents for the best part of a year. Traffic movements on the M5 in particular, are likely to be highly compromised. Outdated and inaccurate traffic projections put forward by the Intermodal are a key problem of all applications.

The real transport issues will be comprehensively laid out in NSW transport planning reports due to be released as per the 2016/17 Budget Estimates Hearing of the NSW Government, as follows:

"The NSW Government has committed \$3.4 million to progress studies into road infrastructure options to manage traffic impacts from the proposed Moorebank Intermodal Terminal and forecast growth in the broader Liverpool and Moorebank area."

It is improper for this modification application to be assessed before these study reports are released. It would appear highly likely that in the event of revised usage projections based on the current rapid growth of South West Sydney, the calculations made by the proponents will be shown to be out of date and thus severely inaccurate, with the probability that serious damage will be caused to the South West Sydney road system if the modification is accepted. The modification application should thus be declined, until essential traffic projections are available for due consideration under a complete new application, using state projections.