

MIC EIS Response

I wish to object to the MIC proposal as detailed in the EIS.

The Liverpool area is a growing city, open for business, but more than anything a place people call home.

The proponent speaks and acts as if the impact of thousands of traffic movements a day and the imposition of an industrial wasteland on what is primarily a residential area is no significant thing, but it is to honest hard working residents who just want to enjoy their street and their backyard while they pay off their mortgage. They don't want their kids to get sick and they don't want their suburb and local environment degraded in any way. Not degraded "within acceptable levels". They don't want "low level" impact on their sleep and health. They want to get on with their lives, to sleep at night and go to work refreshed in the morning and to spend time with their families kicking a ball in the backyard without choking on diesel fumes while the kids wheeze and reach for their puffers.

Liverpool Council supports these objectives and is pursuing a vision for the City of Liverpool that maximises opportunities for businesses while providing an enriching and livable city for residents. For that reason Liverpool Council supports the Badgerys Creek Airport proposal and is strongly encouraging the moving of the intermodal development to the vicinity of Badgerys Creek where there will be acres of warehousing and which is much more centrally located to the demand identified by MIC. Any consideration of this development must be considered in the context of the wishes of the local community and the plans expressed by their elected representatives.

Having reviewed the EIS, I have the following comments for your consideration.

I cannot understand why SIMTA would put forward one development in one location, proposed to be developed at the same time, but submitted as two separate EISes - SIMTA and MIC. The planning process would be extremely flawed if this kind of gross subterfuge is allowed to pass. Since SIMTA is developing both sides of Moorebank Avenue simultaneously it is essential that the whole development be considered as one so that the need and the impacts can be considered holistically from the outset and residents rights can be properly protected. The developer is using this ruse of two separate EISes to pretend that the impact is half what it really is.

The TEU volumes proposed by the proponent are extremely high. In the SIMTA application, the PAC concluded that 250,000 TEUs are sufficient for the South West to meet the government's target for container movements by rail. Since SIMTA, who is also the company developing the MIC development, already has approval for all of the 250,000 TEUs that are needed in the South West, clearly no additional TEUs should be approved for the MIC component of the development.

The proponent is requesting approval to ship 1.5 million TEUs through just the MIC half of the development. This is equivalent to the size of Port Botany in 2006, wedged between three residential suburbs and next to a river. It is unthinkable that such intensive development could be compatible with such a location. Recent media report show that residents neighbouring Port Botany have been harmfully impacted by the noise of Port Botany and that the EPA was incapable of protecting them. There should never be a repeat of the disaster at Port Botany and the IMT that Sydney needs should be built in an industrial area, such as at Badgerys Creek under the flight path of the new Airport surrounded by new warehouses that can consume the 1.5 million TEU avalanche.

The statement “The site is adjacent to the SSFL, the East Hills Rail Line and the M5 Motorway.” is inaccurate and misleading. The site is adjacent to the Georges River and the houses of thousands residents.

The southern rail connection provides no noise protection for residents in the southern part of Wattle Grove other than bushland, a fair proportion of which SIMTA seeks approval to put to the chainsaw.

The proponent’s statement “The Project site was selected for ... its central location relative to major freight markets in the west and south west of Sydney” is misleading and deceptive. MIC modelling shows that these markets are centered on Eastern Creek, 20KM to the north. This is not a benefit at all, but a cause of major traffic disruption on critical Western Sydney arterial roads. This is in fact an argument for locating the IMT elsewhere, for example at Badgerys Creek where new infrastructure is already in the planning stages or at Eastern Creek where most of the containers need to be.

Where the proponent says “A number of submissions suggested the demand could be accommodated within Sydney’s existing IMT facilities; however, IMTs serve a defined geographic catchment and there is clear demand for Moorebank from a catchment area that is different to that served by existing IMTs” this is also misleading. While they plan to service a different catchment to the other IMTs in the South West, their modelling shows the demand is nowhere near Moorebank which is at one extreme end of the supposed catchment.

While the proponent claims that visual impacts will be unavoidable, residents have a right to have their outlook (and therefore their property values) protected. The proponent should provide a guarantee that all residential properties will be shielded from any industrial development in their outlook.

The proponent claims “No other known site in Sydney has the same unique characteristics to efficiently accommodate the type of activities being proposed”. Clearly they haven’t been listening when the Liverpool Council proposed the IMT be located at Badgerys Creek. The supposed advantages of Moorebank are its size, its proximity to road and rail infrastructure. Each of these characteristics can be a feature of the Badgerys Creek location. Building an airport locks up a lot of land for industrial use because of the flight paths and the noise of the

aircraft. This means there will be space for both long trains and lots and lots of TEUs. It also means that the warehouses that will be built there will be a popular destination for containers at Badgerys Creek minimising the need for additional infrastructure.

Badgerys Creek is already planned for major road and rail development. By considering a terminal there at this stage there will be no problems in building the infrastructure along with the IMT. Releasing the land at Moorebank for development as residential or commercial will raise sufficient funds to extend the freight line beyond the residential areas where it now runs, mainly due to previous planning failures. We should not allow the planning failures of the past to dictate new planning failures today and into the future. Why condemn thousands of residents to live next to a new Port Botany scale development just because the planners of the past didn't put industrial and freight rail together.

The proponent argues "The Moorebank precinct needs to be developed to a total intermodal capacity of 1.55 million TEU". If this is so, then it is an extremely strong argument to bite the bullet and spend the money on rail infrastructure now to locate the terminal away from residential areas that it is fundamentally incompatible with. Despite the argument that it is uneconomic to do this, the basic argument in favour of an IMT is that it is more cost effective to rail the containers than to build enough roads to freight them by road. With that in mind, surely the one primary economic concern should be where do they need to end up, not where does the freight rail go today. It must be cheaper to build a freight rail alongside the new passenger rail to Badgerys Creek than to upgrade every single arterial road between Moorebank and Eastern Creek and all of the other 20-30KM distant destinations that MIC identified in the original EIS. The proponent's concept of Economic Viability extends only to its own costs and profit, not to the true impact on the people of NSW and the infrastructure that must be paid for by their government to make their development economically viable.

The proponent argues "No other site has been identified that is practicably feasible in the timeframe required", but the time pressures have been eased significantly by a slowing in the rate of container movements and by new capacity being built by Asciano. This argument now favours good planning over the indecent haste proposed by the proponent.

The EIS response can be summarised as follows - the Moorebank option is cheaper than lower impact options. The Moorebank option mainly impacts local residents and the traffic congestion was going to be bad anyway. Previous poor planning means that all of the ingredients needed for the IMT happen to be in Moorebank, so the IMT should be in Moorebank regardless of the impacts. This kind of blame the victim approach is completely unacceptable. The quality of planning in Sydney is atrocious and it is due to this kind of band aid thinking. Nearly every unpleasant development is next to someone's house - airports, sea ports, IMTs, Rail, Motorways all cut through residential areas without thought for buffer zones or combining unpleasant, unhealthful or unattractive developments. What Sydney needs is to stop plonking the next dirty thing in the first available space and to start thinking strategically. Liverpool Council has shown more strategic thinking in proposing Badgerys Creek than has been seen in Sydney since Bradfield's day. The Badgerys Creek location is ideal. Yes, there is a need for infrastructure, but it can be built in a planned way in conjunction with other infrastructure that needs to be built.

Allowing the self interest of the developers to dictate the location, capitalising on previous planning mistakes would be extremely regrettable. If we want Sydney to be like Paris, we have to plan to make it like Paris. If we want Sydney to be like a miserable industrial wasteland of the industrial revolution, we need do nothing but approve developments like the MIC development next to as many residential areas as possible. Cities go down hill one development at a time. It has to stop here and now.