

Application number: SSD 5066/EPBC 2011/6086

Project name: Moorebank Intermodal Environmental Impact Statement

Objection to the Moorebank Intermodal Proposal

Name: Todd Bertram

Address: 44 Blamey Road, Wattle Grove NSW, 2173

Phone: 0419442897

Email: ber8880@bigpond.net.au

Significant problems with the Moorebank proposal

The Moorebank site constrained by a number of issues:

- Given the evidence that is already available on the affect of Diesel Particulate Matter 2.5 the approval of this project would be **GOVERNMENT SANCTIONED MURDER!**

There is no difference between the approval of this project and the **DEATH PENALTY.**

The individual **State and Federal politicians and the corporate Individuals** as well as there companies and shareholders are accountable and **will be held to account** in a legal proceedings for the Death and Destruction this project will inflict on the local residents should it go ahead. You have been warned.
- The PAC determination of the SIMTA proposal has already revealed that Particulate Matter 2.5 levels in the local area are close to or above the advisory criteria for this pollutant, this applies to the current background levels as well as the predicted impacts. Additional diesel and liquid natural gas powered vehicles in this area will exacerbate this problem.

- There are significant problems relating to air quality, construction and operational noise impacts created by the intermodals. A proposal of this size and nature should not be earmarked for a residential area.
- The area is already suffering from significant traffic congestion, the addition of an estimated 10,000 truck movements and approximately 5,000 passenger car movements per day will exacerbate this congestion.
- The Planning and Assessment Commission (PAC), following their community meeting on the SIMTA proposal, has identified that the Moorebank area is already suffering from significant traffic congestion. 'The community has strongly argued that the proposal is only going to move the congestion from Port Botany to the Liverpool/Campbelltown region. The Commission understands the Moorebank site is constrained by the surrounding residential and industrial land uses and the already heavily congested local and regional road network. If the concept plan were to be approved with the levels of throughput proposed by both SIMTA and MIC, then clearly the community's case is strengthened.' (2014, Planning and Assessment Commission, SIMTA assessment).
- The SIMTA Concept plan was approved by the PAC on the basis that they are limited to 250,000 TEU's, plus an additional 250,000 **ONLY** if the road network is able to handle the volume of heavy vehicle traffic. This being the determination made by the PAC, and in the absence of a master plan that would have enabled the commission to assess the impact of both proposals as part of the one process, this limit should apply to the operation of both SIMTA and Moorebank intermodal sites combined. TEU's should be limited to a total of 250,000 in this precinct.

- Noise impacts, light spill and air pollution will have a detrimental effect on the local community, some of whom live as close as 400 metres from the site. Residents around Port Botany living as far as three kilometres from the port are affected by these factors; many residents in Chifley for example have been very vocal about sleep disturbance in the online domain.
- The Moorebank site will have a detrimental impact on the Casula Powerhouse Arts Centre. The presence and accessibility of an art and cultural facility in a low socio-economic area, such as Liverpool, is essential for positive community growth.

Problems with the process

The Freight Infrastructure Advisory Board (FIAB) recommended a master plan for the site, this was not undertaken. Residents agree the SIMTA and MIC proposals should have been considered as a single precinct application. This has created an unfair advantage for the proponents with confusion being created among the community with both proponents presenting different figures. The fact that both proposals were assessed separately also means that media attention highlighting the different stages of the planning and assessment process has also created confusion in the community. Coupled with this, the relocation of the Defence National Storage Distribution Centre (DNSDC) and the current construction works at Holsworthy Barracks have also exacerbated this confusion with many people within the community thinking the proposal is already in its construction phase.

Liverpool Council, in meeting with PAC expressed disappointment that a master plan was not undertaken and confirms that this has created confusion within the community *'The ad hoc approachleaves gaps and inconsistencies in the information available resulting in a lack of transparency and reduced faith in government decision making.'*

A master plan would have reduced this confusion and allowed the community to better understand the impacts these proposals will have on their family, friends and neighbours. It would have allowed the community to better refute claims made by the proponents, and have a much greater grasp of any proposed mitigation strategies for this proposal.

The MIC has also created confusion and doubt within the community, adding to a reduced faith in government process and decision making. They have done this first by splitting their figures. Rather than telling the community that there will be 1.55 million TEUs going through the site, they have split these figures between import-export and interstate. And rather than stating that there will be an estimated 297 train movements expected at the site, they have again split these figures to make them sound lower. The Liverpool Leader, in their article 'Intermodal company gives community \$1m for compensation package but concerned residents aren't buying it', reports on community concerns around the consultation process. This 'compensation package' will be completely inadequate to address the impacts this proposal will have on the area, and made MIC seem like it was trying to 'buy community support'. At the same time MIC also made a highly publicised donation to the Liverpool Mayoral Ball, which Liverpool Council subsequently rejected (Hansen, N., 2014, 'Liverpool Mayor knocks back \$5k ball donation from intermodal group but the cash is still destined for charity', Liverpool Leader, 22 August 2014).

An intermodal at Badgerys Creek would not require this level of compensation, as it can be properly planned for a suitable area; it also has residential and council support.

Second, the Sydney Morning Herald in their article 'Waterfront baron and Liberal Party donor scored inside running on freight hub tender' has highlighted a possible issue around transparency and due process in the awarding of tenders for the Moorebank precinct. In

light of the recent ICAC investigations and the problems faced by the Newcastle community, transparency and due process are paramount in the government decision making process.

Key issues from the community

There were some issues raised by local representatives and the community at the PAC determination meeting on the SIMTA proposal. These have remained largely unchanged in relation to the MIC proposal.

Traffic and access

- The proposal will move the congestion from Port Botany to Moorebank, which is already congested;
- Modelling does not include the predicted growth of the region;
- The intersections and road network are already congested, how is it possible for the proposal to decrease traffic delays?
- Trucks 'weaving' onto and off the M5 between the Moorebank and Hume Highway interchanges, this is going to cause accidents; and
- Trucks parking and taking short-cuts through the nearby streets.

Noise

- There is no noise wall along the rail corridor along the Georges River, so noise will carry particularly at night;
- Noise from the unloading/loading and movement of containers within the terminal;
- Noise from the breaking and shunting of trains due to the site sizing constraints; and
- Wheel squeal from the trains exiting the SSFL, tight radius curves lead to wheel squeal.

Air quality

- Increased diesel fumes in the community generated from locomotives, heavy vehicles and other heavy equipment used on site;

- Health impacts from the increased diesel fumes;
 - South-west Sydney is already heavily polluted due to the topography; and
 - Dust and odour, particularly during construction.
- Two intermodal proposals (SIMTA and MIC)**
- There is an ad hoc approach to the two proposals;
 - Cumulative impacts of the two proposals have not been adequately addressed; and
 - Confusion as to the total traffic generated from the two proposals, as the modelling for each is different.
- Heritage**
- Removal of heritage features from the site, particularly those of military and indigenous significance.
- Location**
- Site is surrounded by residential development; and
 - Other sites are preferable, such as Badgerys Creek, which is not surrounded by an established community.

Moorebank Intermodal Company EIS presentation

There was considerable concern from the community over the presentation that was given for the MIC EIS submission. Figures and statistics presented by MIC seemed to be inconsistent and the facilitator tried, on a number of occasions, to ask the community to voice their concerns directly to MIC representatives rather than in the public forum. At each of the three sessions the facilitator kept stating that she was conscious of time; however, the community feel that their questions about a proposal that will impact their family and community deserved an answer, and are more important than clock watching. The number of questions from the community at the final community information session saw the session run over time.

Traffic and Transport

- The MIC recognised that there are significant transport and traffic congestion problems in the Moorebank precinct; however, they claim that the additional 8,160 heavy vehicles and 5,724 cars they predict to be brought into this precinct every day due to an intermodal will not have any further impact.
- The Chief Executive Officer of MIC stated that there would be approximately 1.6 trucks required per TEU. He also stated that 1,400,000 TEUs would be required to leave the terminal by truck. According to this statement, and given that heavy vehicles will have to both arrive and leave from the precinct, the figure of 8,160 heavy vehicles per day seems low, this actually equates to 12,376 heavy vehicles per day. For the purposes of this document the figure of 10,000 heavy vehicle movements per day has been chosen as a more accurate representation of the figures.
- The Chief Executive Officer of MIC also confirmed that the Moorebank intermodal will not take heavy vehicles off the M5 between Port Botany and Moorebank, and that as Port Botany expands the number of heavy vehicle movements on this stretch of the M5 is expected to grow. It should be noted that Labour Minister Anthony Albanese previously claimed that the Moorebank intermodal would take trucks off the M5; this fallacy gained a lot of momentum especially in the media and it has never been publicly corrected.
- Questions were raised by the community about the problem of Trucks 'weaving' onto and off the M5 between the Moorebank and Hume Highway interchanges. MIC recognises this as a significant problem.

This 'weaving' has the potential to cause a recognised 'black spot', with potentially fatal consequences for the community. It is worth noting that a 'black spot' is

already located at the Nuwarra Road and Heathcote Road intersection, only 2 Kilometres from the 'weave' site.

- The traffic modeller for MIC presented information about the predicted impacts on intersections both with the intermodal and without. Intersection surveys were undertaken on Tuesday 7 December 2010, and Tuesday 18 March 2014, in peak hours only. It is concerning that these surveys seem to only have been conducted on two days, four years apart, with the December date being in a peak holiday period.
- A Seven-day automatic traffic count was also conducted from Tuesday 7 December 2010 at only three locations along Moorebank Avenue. It is concerning that four year old data, gathered prior to a number of new and extensive residential developments in the area, is being used as a base for traffic modelling.
- The data presented by the traffic modeller showed a delay of over 200 seconds at some intersections when the intermodal is in operation. A 200 second delay, coupled with a 150-180 second cycle on a normal set of traffic lights is a significant impact (approximately six minutes at EACH set of lights), one that is likely to have flow on effects.

He has compared data, which is based on a scenario where the intermodal is operating with road and intersection upgrades, with predicted data based on no intermodal without road upgrades. This is not comparing like for like. Given that intersections in this area are currently operating at D or E classification (near or at capacity), it is hard to believe that the roads in the area will not be upgraded by relevant authorities to attempt to reduce congestion before they reach an F classification.

- It has been noticed that traffic figures do not take into account the recently announced WestConnex which will have major traffic implications on the M5 during construction; this coincides with the proposed opening date of the Moorebank intermodal.

The WestConnex project also aims to increase Port Botany by 272% more container ships by catering for a greater number of heavy vehicle traffic movements on the M5.

Labour Minister Anthony Albanese criticises the WestConnex 'proposal for not going near Port Botany, where it is expected there will be a large rise in the number of container trucks'. He also questions the government's transparency, citing that 'the decision to release new information about the impact of WestConnex on Melbourne Cup Day indicates to me that those who support this route are aware of its shortcomings and are keen to avoid public scrutiny.' (Saulwick, J., 2014, 'Albanese pans plans for the WestConnex', Sydney Morning Herald, 10 November 2014).

- Residents are understandably concerned about the impact of intermodal traffic on local and residential roads. The MIC confirmed at the community information session that while they can implement some measures for traffic movements, it will ultimately be up to the design of the precinct, the way the precinct operators choose to use the precinct, and choices made by heavy vehicle drivers as to which route they choose to use. With heavy congestion on Moorebank Avenue and the M5, two of the key roads in the area, it is likely that Anzac Road and Cambridge Avenue will be used as 'rat runs' for heavy vehicles.
- The MIC traffic modeller recognised that currently 6% of traffic on Anzac Road in the peak is heavy vehicle traffic; however he failed to include any heavy vehicle

movements in his trip distribution figures for this road. In current heavy traffic conditions Anzac Road is a very attractive option, as demonstrated when the M5 is congested. Heavy traffic movements on a congested day are far higher than those measured by MIC. The omission of this traffic flow information from MIC data sets is hard to fathom. For the local residents, especially those with houses that back onto Anzac Road, it creates uncertainty and distrust in the accuracy of the information presented.

- The construction of an intermodal terminal at Moorebank shows a lack of strategic planning, particularly in relation to future traffic movements.
- An intermodal at Badgerys Creek will be a true intermodal with road, rail and air access. This area will serve the purpose of meeting the needs of future growth centres. The government currently has the ability to configure appropriate and safe truck access in the Badgerys Creek area with \$3.5 billion in funding dedicated for road infrastructure.

Rail access

- MIC has predicted an additional 297 train movements each week, this figure does not include the interstate trains that may transit through the terminal.
- It was unclear how these train movements would impact residents in the area, due to three different rail entry options currently under consideration.
- Due to the length of trains, they will need to be broken up and shunted.
- MIC communicated that the actual rail entry will be decided once a tender for operation of the facility has been awarded. This makes it difficult for residents to understand the impacts of the rail access.

- It is unclear whether rail access will impact the passenger rail line and impact on travel times for people travelling by rail to the Sydney CBD.
- An intermodal at Badgerys Creek will not have the same rail implications. The size of the site will allow trains to remain whole within the terminal without the need for breaking and shunting.

Noise and vibration

- In order to ascertain acceptable noise levels in the area, the MIC have measured ambient noise levels between 2010 and 2011, and then from July 2012 to establish a base index. Approximately 20 of the 34 noise receptors set up and monitored by the MIC to establish this base index were located along train lines and major roads.
- Given that most residents in the area live in quiet, peaceful streets, it is a concern that the receptors set to ascertain the base index for ambient noise seems to have been placed in predominantly noisy locations.
- The residential suburbs of Casula, Wattle Grove and North Glenfield are the closest communities to the Project site; however, these will not be the only locations impacted by the noise generated from the proposed intermodal.
- In a recent article in the Sydney Morning Herald it was learned that 'After more than a year of residents around Port Botany being told the night time noises they were complaining about did not exceed "sleep disturbance criteria", the Environment Protection Authority has admitted they were right.' (O'Brien, N., 2014, 'EPA admits it was mistaken about Port Botany noise levels', Sydney Morning Herald, 17 August 2014).

- Residents in the precinct are understandably concerned that noise levels will exceed those acceptable. Above acceptable noise levels can have health impacts including: annoyance, sleep disturbance, performance issues (reduced concentration), cardiovascular health problems, hearing problems, mental health effects, and general health impacts (e.g. on the immune system).
- There is currently no noise wall along the rail corridor along the Georges River, so noise will carry particularly at night.
- There is no doubt there will be excessive noise from the unloading/loading and movement of containers within the terminal, which will operate 24 hours a day, as well the breaking and shunting of trains due to the site sizing constraints, and compression breaking of trucks on the surrounding roads.
- Wheel squeal from the trains exiting the SSFL have also been identified, as tight radius curves lead to wheel squeal. The MIC noise analyst has agreed that wheel squeal is likely to be a factor with some of the three different rail entry options currently under consideration. A factor that will apparently be decided once the tender is awarded, a decision that is likely to be economically based with no consideration for the nearby community.
- An intermodal at Badgerys Creek will not have the same noise implications, due to it being located in a purpose built heavy industrial area. The size of the Badgerys Creek site will also allow trains to remain whole within the terminal, negating the need for breaking and shunting of trains. Rail access will not be restricted by the construction of rail bridges over the Georges River, as is the case at Moorebank, reducing the instance of wheel squeal by negating the need for tight entry and exit

points. Compression breaking can be limited through planned road upgrades specifically designed for heavy vehicle movements.

Local air quality

- MIC have recognised that exposure to pollutants and particulate matter (PM) can contribute to, or exacerbate, respiratory and cardiovascular issues, including premature mortality and morbidity, in addition to increasing associated hospitalisations. This supports that point that this proposal should not be planned for a residential area.
- Placing a heavy industrial facility in the middle of a residential area is negligent and will be detrimental to the community. The proposed site is located in a basin which allows pollution to lie, rather than easily move away. The NSW Planning and Assessment Commission have already recognised that the air quality in the Liverpool area is generally well below guidelines, particularly PM2.5 concentrations which are close to or above the advisory criteria. Additional diesel emissions and particulate matter released from this proposal will prove dangerous for residents, especially the most vulnerable: children, the elderly and disabled members of the community.
- Diesel fumes and particulate matter are carcinogenic, and as well as causing other serious illnesses, will be fatal for some members of the community.
- It has been identified that diesel locomotives and switch engines are significant contributors of SO₂, NO_x, PM₁₀, PM_{2.5} and PAHs, while onsite mobile equipment (ITVs, side picks and forklifts) are the highest contributor to CO and VOC emissions, they also contribute substantially to PM₁₀, PM_{2.5}.

- It is understood the decision about onsite equipment will be made by the tender winner and based on economics rather than community welfare.
- During operation of the Project, combustion engine emissions (i.e. NO_x, CO, SO₂, PM_{2.5}, PM₁₀, VOCs and PAHs) from locomotives, mobile LNG equipment and heavy vehicles represent the greatest potential for air quality impacts.
- With 297 train movements each week and approximately 10,000 truck movements each day it is concerning that a proposal of this nature could be considered alongside family homes, and close to pre-schools, primary schools, high schools, as well as aged care facilities.
- Badgerys Creek, an Australian Government owned area, is away from residential properties, and therefore not likely to cause the same risks as the Moorebank site. It is also well placed near the M7 and the proposed M9 Motorways, providing the ability of the intermodal to service future growth centres, near the Western Sydney Employment Area (WSEA), future industrial areas and future freight markets in Western Sydney, where two-thirds of container freight received at Port Botany will be transported.

Human health risks and impacts

- The NSW Chief Health Officer's Report (2010) identified that health gains achieved over the past few decades have not been equally shared across the entire NSW population and that there is a gap between those with good and poor health. This gap is exacerbated in poorer communities.
- South Western Sydney has some of the poorest communities in NSW as measured by the SIEFA data (Australian Bureau of Statistics (ABS 2011)).

- South Western Sydney has higher rates of people with disabilities than the NSW average. People with disabilities have health conditions which may or may not be related to their disability.
- In 2004 - 2008, South Western Sydney residents had higher incidence of lung, kidney, head and neck, pancreas, thyroid, stomach, bladder, uterus and liver cancer than NSW.
- Mortality rates in South Western Sydney for cardiovascular disease at 83.9 per 100,000 are 5% higher than the NSW average of 100 and are significantly higher in Liverpool LGA (111.4) (2005/06).
- Very high psychological distress was reported by 13.2% of South Western Sydney residents (2.1% above the NSW average).
- As previously noted, MIC have recognised that exposure to pollutants and particulate matter (PM) can contribute to, or exacerbate, respiratory and cardiovascular issues, including premature mortality and morbidity, in addition to increasing associated hospitalisations. And that that diesel locomotives, switch engines, and onsite mobile equipment (ITVs, side picks and forklifts) are significant contributors of PM10, and PM2.5.
- As also noted, above acceptable noise levels that will result from an intermodal terminal can have health impacts including: annoyance, sleep disturbance, performance issues (reduced concentration), cardiovascular health problems, hearing problems, mental health effects, and general health impacts (e.g. on the immune system).

- Traffic impacts with the identified the problem of Trucks ‘weaving’ onto and off the M5 is a significant problem. This ‘weaving’ has the potential to cause a recognised ‘black spot’, with potentially fatal consequences for the community.
- It is highly negligent of the Government to consider building an intermodal at the currently proposed Moorebank site. The site is located in the middle of a residential area, and the consequences of such a decision will prove dire to the community.
- Badgerys Creek is by far a site better suited to meet the criteria that the MIC has listed in their EIS summary.

Support from elected representatives

The role of three tiers of government is to ensure that community needs can be voiced to the government by their local elected representatives. These representatives are based within the community, they understand the local area, and are acutely aware of the geographic typography of the area and their constituents needs.

The representatives from the Liverpool area are all unequivocally stating that the Moorebank Intermodal proposal is in the wrong location. This includes the federal member for Hughes, Craig Kelly MP; the state member for Menai, Melanie Gibbons MP; and Liverpool City Mayor, Ned Mannoun.

It is worth noting these representatives recognise the need for an intermodal terminal within metropolitan Sydney to support future freight growth in New South Wales; however, Badgerys Creek is the ultimate location for this development. Liverpool Council have recently released a discussion paper titled ‘Badgerys Creek: the ideal location for an intermodal’ (October 2014).

It is time for the government to listen to their party members who are voicing some very valid concerns, and join the discussion about a new location for this project.

Alternative uses for the land at Moorebank

The residents of Liverpool also support the Freight Infrastructure Advisory Board (FIAB) recommendation of the development of new intermodal freight capacity within metropolitan Sydney. However, the residents believe that the location of this development should be strategically placed to meet future growth and freight capacity. Therefore, it is proposed that Badgerys Creek, rather than Moorebank, is recognised as the consummate site for development.

‘In 2011, the Australian Government developed the Liveable Cities Program (now called the Liveable Communities Programme) to support state, territory and local governments in meeting the challenges of improving the quality of life in our capitals and major regional cities’ (2011, Department of Infrastructure and Regional Development website).

As part of this program, Parramatta City Council (the only Sydney council selected for the program) received \$16,150,000 in funding to complete three missing links on the Parramatta Valley Cycle way, and undertake a series of related works on the Parramatta River Foreshore. The money used for this revitalisation has given Parramatta an economic and social boost.

The site identified for the Moorebank intermodal is prime, urban, riverfront land. This land should be used to assist the government in solving the housing crisis identified in the draft Metropolitan Strategy for Sydney, by using the development as a premium riverside residential lifestyle precinct. The land is situated less than 30 Kilometres from the Sydney

CBD. It is in close proximity to public transport, including the T2 Airport and T2 Inner West & South lines (both of which have capacity to accommodate urban growth in this area), the Liverpool to Parramatta T-Way, the M90 Liverpool to Burwood bus route, and many suburban bus routes. In short, the Moorebank location is perfectly positioned and adequately serviced by public transport to assist the government in meeting its housing targets set in the Metropolitan Strategy for Sydney.

An independent valuation (Cushman and Wakefield Development Opportunity Liverpool Riverside Lands, September 2014) valued the SIMTA and MIC sites at more than \$482 million. Revenue raised from the sale of this land could be used to assist in the funding of the infrastructure needed to support, and fast-track an intermodal at Badgerys Creek.

NSW Chief Health Officer's Report (2010) identified that there is considerable evidence that social factors (e.g. income, employment and education) have a critical role in health outcomes. A plan to revitalise the Liverpool area by embracing natural assets, such as the Georges River, and utilising land to its full potential presents an opportunity to lift the socio-economic status and improve overall health in the area. The Liveable Communities Programme in Parramatta is a testament to this.

Preserving the Casula Powerhouse Arts Centre and maintaining its accessibility to the community will boost the social economy of the area and contribute positively to community growth.

Linda Silmalis, in her Sunday Telegraph article (9 November 2014) says that 'NEW housing sites for 11,000 homes will be unlocked today as the NSW government seizes on a building

boom with one of the biggest land releases in Sydney this year.’ On this topic, ‘State Planning Minister Pru Goward said the areas will help drive the housing construction boom, while placing downward pressure on house prices.’ (Silmalis, L., 2014, ‘Grab your new home out west’, Sunday Telegraph, 9 November 2014). Liverpool Council estimates that the land proposed for the Moorebank intermodals has the capacity for approximately 16,500 riverside dwellings, housing more than 40,000 people, and giving the community access to the Georges River. This will assist the government in meeting its targets, identified in the draft Metropolitan Strategy for Sydney, to develop housing for more than 1.6 million people. Affordable housing is a much better use of the land in this area.

Good, well considered, strategic planning is required to maintain New South Wales’ status as the Premier State. This includes planning major infrastructure projects, such as an intermodal terminal, in the right location. The right location for this proposal is not Moorebank; Badgerys Creek is far better suited and situated to meet the Government’s freight infrastructure needs.

Please reject this proposal on the grounds that it is not in the public interest of the residents of Liverpool or the wider community.