

Objection to the Moorebank Precinct West Stage 2 proposal Environmental Impact Statement.

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Casula 2017

I have not made any reportable political donations in the past two years.

I object to the Moorebank West Precinct West Stage 2 proposal. The proposal should not be approved as currently proposed because the proposal is not in the public interest, and it should be refused. In the alternative, conditions that I suggest below should be attached to it.

Once again, the state listed important historic buildings and garden of Glenfield Farm, circa 1917, has been ignored in the SIMTA EIS, as it was by the Moorebank Intermodal Company in its submissions to the NSW Planning Department. The report I submit, authored by Brian Marston, acoustical engineer, confirms that the Farm, as it is known locally, will be subjected to extreme levels of noise, particularly curve squeal, from the rail link to run between the SSFL and the rail bridge across the Georges River leading to the development. It is an unfortunate irony that in the year of its bicentenary, this jewel in the heritage crown of NSW is to be subjected (unintended by the state heritage department) to serious permanent damage by extreme noise. I would ask the NSW Planning Department to finally investigate and set appropriate conditions in respect of the complex issues below, which have led to this shameful abdication of responsibility for a state listed historical asset. I note that when people set foot on Glenfield Farm, they frequently say they immediately feel themselves to be in a very special place. I would ask that this place be preserved for the future, rather than being subjected to levels of rail noise and curve squeal that may severely impact on the livability and use of, and therefore the long-term viability, of the historic house, dairy/bakehouse, stable, and historic garden.

I note that Glenfield Farm is listed by the state of NSW as a heritage item of exceptional significance. Myself and my husband are the freehold owners of Glenfield Farm.

My objections cover the following areas:

**Rail Noise, curve squeal, the link/spur lines and the impacts on Glenfield Farm**

**Land ownership issues and loss of public recreational land amenity**

**Train scheduling issues**

**Environmental and public health issues**

**Loss of amenity to Leacock Regional Park**

**Traffic Impacts**

**The Unsuitability of the site**

**1. Rail Noise**

Brian Marston is a leading expert in Australia in the area of acoustical engineering. His report (attached) finds that data from a recent academic paper confirms that excess noise, particularly loud curve squeal, will be caused by operation of the rail spur link between the Southern Sydney Freight Line (SSFL) and the Moorebank Intermodal Terminal bridge over the Georges River. The data indicates that automatic greasing of the rail lines (made as a condition by the Planning Assessment Commission in respect of the MIC application) will not fix the problem. However, the Marston Report also details how this problem will escape scrutiny: noise monitors will be placed well away from the part of Casula which contains Glenfield Farm and other affected residences. Excessive noise caused by the operation of the rail link will therefore not be monitored or recorded.

In view of the findings of the Marston Report, I request that the NSW Planning Department make a condition that noise monitoring is carried out from Glenfield Farm, which is undoubtedly the most sensitive occupied location at about 240 metres from the SSFL and the rail link connection to it. I also request that the Department place a condition that the Southern spurlink curve, which has a current radius of 160 metres, be widened. This measure was proposed by the Planning Department in its response to the MIC Stage 1 application, but this was not carried out by the developers - only one curve has been widened, and the remaining line is the most problematic. The problems associated with changing the remaining tightly curved line will be discussed below, but I contend that the NSW Planning Department should now proceed to prevent outcomes such as the highly excessive noise impacts on Glenfield Farm and surrounding residences.

I note that in the event of Glenfield Farm being monitored, and in the event of excessive noise readings which our submitted evidence indicates will certainly occur, the body charged with oversight of the project, in this case Liverpool City Council, will have a number of options open to it. These includes fining the rail operators for each breach, and finally, the option to shut down the operation of the rail link. The Federal Government has been made aware of this major risk factor relating to the rail link, and the State of NSW should also be aware of this probable outcome.

The unsuitability of this rail spurlink site, the last option left after two other sites were rejected, is underlined by questions that remain unanswered over ownership of the land over which the spur lines will run. This issue is addressed in the next section. The spurlink line site is unsuitable for multiple reasons and should be rejected.

**2. Rail spurlink land ownership issues**

Examination of a map of the site on the EIS will immediately show the unacceptably close relationship of the spur line site to the Glenfield Farm buildings and the historic garden. This is presumably why the the NSW Planning Department recommended that the MIC widen its spurlink line curve radius in its findings for the Stage 1 EIS, even though at that point the first Marston Report, which was subsequently presented to the PAC, had not detailed the major faults in the Stage 1 acoustical reports submitted by the developers. I have also enclosed the first Marston Report. It is also clear from the map that if the Southern spurlink line was taken in a gentle curve across the Northern part of the Glenfield landfill site much of the rail noise and curve squeal would be ameliorated. Instead, the curved link line is crammed into the Northern end of this site directly in front of Glenfield Farm, presumably because the Glenfield Waste Services owners have declined to make any more land available.

The Moorebank Precinct West (MPW) Stage 2 EIS in its Rail Access Report 2.1 The Rail Link (pg 9) asserts that "The route from the SSFL is through land owned by the Glenfield Waste Facility (GWS)..." but I can find no evidence to support this statement.

I note that accuracy of ownership and property details are planning and statutory requirements in respect of the Moorebank Intermodal site. My understanding is that the land occupied by Glenfield waste Services is public land, and there is no evidence I can find that this is not still the case. Three and a half years ago, when carrying out due diligence for our private purchase of Glenfield Farm, which was subsequently completed, I went into Liverpool Council and viewed documents that stated, from memory, that:

"The land was to be passed to Glenfield Waste Services for the purpose of running a waste landfill operation with the lesser operation duration expected to be approximately ten years (this time has been exceeded). After the site was filled and remediated, the land was to revert to public recreation space to be administered by Liverpool City Council. My understanding is that uses for the space that were under consideration included a golf course. Unless something has changed, Glenfield Waste Services and its parent company do not own this land and cannot offer or sell on the land to MIC/SIMTA developers for use to run a spurlink line. I have been informally informed that records of the Liverpool City Council/Glenfield Waste Services contract were lost in the fire that destroyed the Liverpool City Council building. I was also informed that the problem with the contract with Glenfield Waste Services was that no completion date for their landfill operation was specified, meaning that as long as they keep filling, they do not have to return the land to public use. This however, does not mean they own the land, which should be returned to public use, whatever that may prove to be. The RAID group has also been informed that this land ownership issue has held up State Government approval of the project, but the resolution process has not been made public. As this land is still, as far as I can ascertain, public land, the processes by which it is acquired for use by the developers should be transparent and properly carried out. I would request that the NSW Planning Department deal with this issue. Liverpool Council has not at this time responded to a request for clarification of the ownership of this land, and how any zoning changes have been carried out that remove it from recreational use.

The current situation means that the worst possible outcome for Glenfield Farm is being enabled. If the developers wish to acquire the land from the public, there should be a proper, public process, during which there would be chance for Glenfield Farm and its historic cortlage, outlook and acoustic amenity to be protected at the very least by widening the spurlink curve across this piece of land. Removal of the land into the developed public recreational use could also be contested.

**3. Rail Operation Issues**

The EIS contains errors and fragmented information. For example, in one section the report details acoustic impacts using train speeds of 35kph on the rail link, while in another section it is claimed that the heavy freight trains will leave the SSFL at line speed, which is claimed to be 60kph.

"The proposed rail alignment has been designed in accordance with ARTC standards to a design speed of 60 kph which is consistent with the design and operation speed of that section of the SSFL. The design speed was discussed and agreed with ARTC in order to allow an 1800m long train to enter the rail link at line speed from the SSFL, and be completely clear of the SSFL before slowing." (Ascom Moorebank Precinct West Stage 2 Rail Access Report 2.1 The Rail Link pg 9)

I have been informed that the line speed on that section of the SSFL is in fact 80 kph, which means that fully laden freight trains would theoretically be leaving the SSFL into the spurlink line at 60 - 80kph in order to clear the line for other trains. However, apart from meaning the noise impact calculations are meaningless, it is obvious that no responsible locomotive driver would enter a 160 metre radius curve with a fully laden 1800 metre freight train at these speeds. The unrealistic scenario put forward by the EIS will result in major delays on the essential SSFL as the three to four locomotive monster trains, scheduled to arrive in large numbers each day and night, slowly attempt to negotiate the extremely tight curve link line to the Georges River bridge. It is up to the NSW Planning Department to assess the impacts on such delays to other SSFL users, particularly since the developers are not apparently releasing the proportion of train movements which will be bringing in containers under interstate using the Southern, tightly curved link line. It would appear, however, that this Southern link line will be used by the majority of trains.

**4. Environmental and Public Health Issues**

Three new incursion zones set into the offset bushland running from the Moorebank Intermodal Development to the Georges River, marked as construction zones, will cut off the wildlife corridor and make direct drainage channels between the project and the river, leading to a major environmental threat of highly polluted run-off during adverse weather events.

The intermodal container project will receive containers direct from overseas and interstate, with containers arriving from other countries through multiple ports before transport to the Moorebank facility for opening, processing, warehousing, and distribution. Biosecurity risks are multiple, but include transmission of the Zika virus through mosquito release on opening, and the interstate threat of fire ants. To combat these threats, it is normal practice to fumigate containers with aerosol insecticides, which will inevitably be released into the air. Pollution from diesel particulates, now known to be carcinogenic, will be added to the mix. Fungicides typically used for containers include the highly toxic chemical methyl bromide. Fungicides used in imported containers which are opened at the Moorebank site may also pose health risks to the workers handling them, and others in the vicinity, but the full extent of the risk is not well understood at this time.

The Moorebank site could not be better sited to facilitate release of pathogens, insects, viruses and pests. It is surrounded by bushland, to provide a new home for pests, a major river to transport the problems, still and flowing water, and worst of all, a very close population of people including a large number of children. The continual release of large amounts of voporisised insecticide which will, it can be expected, be required and in an area of regular climatic inversion, is, I suggest, nothing short of irresponsible. This is not an operational issue, it is a planning issue involving public health and risk to the environment. Fungicide residue runoff from the site will presumably end up in the Georges River and will have an unequivocal negative effect on all the aquatic populations downstream to the sea. These vital public health and environmental issues relating to inevitable fumigant/insecticide use, do not seem to have been addressed. I request that the Department address them.

The project will involve clearing of 45 hectares of bushland. It is probable that protected species and highly endangered protected species such as the swamp wallaby and brush-tailed wallaby are present. For example, in the small area of land directly beside the SSFL, Leacock Regional Park, has a small dark coloured resident wallaby which appears to be a protected status swamp wallaby. If there is one in such a small park, it stands to reason there is also a population across the river. Koalas will lose their habitat, and this bushland and its occupants of many species, once lost, will be gone forever. There has been insufficient investigation into this aspect, and I request that a detailed study of protected species be undertaken for the area.

**5. Leacock Regional Park**

Leacock Regional Park runs alongside the local rail line and the SSFL, and will be very severely affected by noise. The park is an important recreational area which hosts part of an extended walkway system between Liverpool and Campbelltown, and a number of protected species of flora (Cumberland Plains weeping grass) and fauna (the protected Cumberland Plains snail and at least one wallaby). The park will be affected by noise, crossover click clack and curve squeal from the spurlink lines running off the SSFL directly adjacent to the park. I have been informed that the construction of the SSFL was accompanied by a one-off payment to National Parks and Wildlife NSW in lieu of providing offset land. This payment, of approximately \$1.2 million, was to be used to remediate Leacock Regional Park and another park in the area. Work is proceeding to clear weed species in Leacock Regional Park, but once the money runs out, there is no plan in place to maintain the park.

The outcome is that Leacock Regional Park will be affected by very high levels of rail noise and curve squeal on a permanent basis, and will likely in short order return to a state of weed infested, high fire risk bushland when the small allocation of cash runs out. This is a bad deal for the public, which has a right to enjoy the public space of Leacock Regional Park without it being treated as an acoustic buffer zone. At the very least, the department should make a condition that the developers maintain the park in a reasonable state on a long-term basis. The developers have not, in my observation, acknowledged the existence of Leacock Regional Park in their submissions. As with Glenfield Farm, Leacock Regional Park (which used to be part of Glenfield Farm) has been excised from the history of the place. Two hundred years, starting with the acreage granted to explorer Dr Charles Throsby, has no place in the plans.

**6. Traffic Impacts**

The very severe traffic impacts of the Moorebank Intermodal Terminal are to be covered in detail by other objections. However, the project will add 25% of traffic to Sydney's worst crash site on the Hume Highway. Seventy per cent of intermodal traffic will use the M5 bridge with its capacity already exceeded this year. We can expect to see more truck versus car crashes and resulting fatalities. The low capacity of the Port Botany line means that many of the projected container numbers will be relied on from interstate. The containers will then be brought onto the roads around Liverpool, including the M5.

Arterial roads around Liverpool are already very slow during rush hours and beyond, and the huge increase in traffic resulting from the intermodal, which is essentially a huge interstate warehousing operation, will virtually paralyse Liverpool and have a cascade effect across the South West Sydney road network. As a high growth area, South West Sydney is going to become a regional casualty because of this one oversized warehousing operation, which should be sited near the new airport. The project should be rejected by the NSW Planning Department on the basis of highly adverse traffic projections alone.

As Liverpool city now stands to become a service ghetto for this vast warehousing development, its future as a centre of new development in South Western Sydney is severely compromised. The impacts of the project have so far not been properly addressed in terms of cost to the taxpayer of attempting to deal with some of the traffic impacts, and loss of the basic amenity of free movement by Liverpool residents.

**7. The Unsuitability of the Site**

This project has been mooted for many years, and is now in the position of being redundant. It did not have an integrated overall plan at the start, but is an amalgamation of two separate projects, and there has not been an overall cost benefit analysis carried out. It is thus a project that has suffered from piecemeal and inadequate plans and dislocation from the needs and very rapid development of the surrounding area of Liverpool City and South West Sydney as a whole. The project has evolved into a vast warehousing operation that is completely unsuited to its location due to development of suburbs in very close proximity to probable emissions, noise, light spill, visual amenity, and in terms of increased projections in the amount of traffic emanating from Liverpool itself. Additional traffic will be created from the development on top of that. The road system in Liverpool will be paralysed by the excess truck movements, as the road changes envisaged will not be in place by the time the project is on line. The new Badgery Creek Airport precinct is a far more suitable location for an intermodal development, and would not have the disadvantages of an extremely expensive rail bridge, acoustically inappropriate linkspur lines, and massive roading realignments and modifications, which appear to be uncalled for and unneeded. The loss of 45 hectares of valuable bushland is unacceptable, and the moving of vast amounts of fill to level the site will cause enormous disruption to local residents. The proximity to the Georges River of this development is simply bad planning, and will have the likely outcome of severe environmental disruption of the river system and its populations.

This project is a retrograde, biggest in the whatever, last century development. What is required now is careful and measured development of acceptably sized warehousing and intermodal facilities in a variety of locations across Sydney, so that one single area is not overwhelmed by enormous truck movements. This development is already underway, so that the monolithic project has little chance of successful operation.

I enclose a planning report prepared by Ingham Planning, which I submitted in respect to the Stage 1 application, and which I resubmit as many aspects are still relevant. The report concludes in part:

"It is very poor planning that results in a facility with a huge potential for adverse impact on residential amenity to be located in an area that is predominantly residential in nature. There are other locations which are more industrial in character, which are far more suited to, and can take better advantage of, a large intermodal facility."

Yours sincerely,

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November 17, 2016.