



NSW Department of Planning and Environment

27 November 2016

RE: Moorebank Precinct West - Stage 2 Proposal

Dear Sir/Madam,

We express our serious concern that this development proposal is being considered prior to the adoption of the South West District Plan, a draft document of which has just been placed on exhibition by the Greater Sydney Commission (GSC). We urge that this proposal be rejected until it can satisfy the intent of the GSC's planning vision for Sydney.

We are a local conservation group established in 1966. We have a close association with the Field of Mars Reserve, East Ryde, a 50 hectare natural bushland remnant. Urban bushland provides significant ecosystem services in regards to improved air and water quality as well as making a contribution to Sydney as a liveable and sustainable international city.

The GSC was established by the State government to coordinate and align the planning that will shape the future of Greater Sydney. This was a sensible decision by government given the fast pace with which housing development was transforming Sydney and impacting on travel times and general amenity for residents and visitors

This fast paced development has been stimulated deliberately across most suburbs of Sydney, but especially in the South West District, as a direct consequence of government policies. These policies have included targeted land releases and a relaxation in the environmental planning assessment and approval process for preferred government development. Such development is often occurring outside the local Council's controls.

The GSC aspires to a productive, liveable and sustainable greater Sydney by 2056. We have no confidence that this ambitious vision will be achieved if government development occurs outside the parameters of a strategic planning framework. The combined impacts of multiply staged major developments such as the Moorebank Intermodal must be captured within the strategic planning process initiated by the GSC. It is imperative that there be due consideration of the recently released draft District Plans as part of the consideration of this development.

In particular:

1. We note that the draft South West District Plan has identified a number of actions relevant to the Moorebank Intermodal:

- P6: Identify transport improvements which deliver east west and north south connectivity;
- P13: Designate Liverpool as a Collaboration Area;
- P15: Plan for the Liverpool health and education super precinct as part of the Liverpool Collaboration Area;
- P19: Identify and plan for efficient movement of freight to, from and within the District, with least impact on residents' amenity;
- P20: Provide adequate access to and from the Moorebank Intermodal Terminal;
- S2: Review criteria for monitoring water quality and waterway;
- S6: Develop a Strategic Conservation Plan for Western Sydney;
- S7: Update information on areas of high environmental value;
- S8: Use funding priorities to deliver the South West District Green Grid priorities;
- S14: Support the development of environmental performance targets and benchmarks;
- S16: Review the guidelines for air quality and noise measures for development near rail corridors and busy roads;
- S17: Identify and map potential high impact areas for noise and air pollution.

We are unclear how these actions in the draft South West District Plan have been addressed in the supporting documents to the application. We could find no mention of the Greater Sydney Commission in the EIS part 1 and 2 documents.

We would have particular concerns at the impact on air quality that the Moorebank Intermodal would generate (even though it was difficult to find details on this when it is in operation). Cumulative impacts on air quality compounded by the impacts arising from the increased growth proposed for western Sydney pose a significant equity issue regards access to healthy air, especially for young children.

2. Significant community concerns were raised regards congestion along Cambridge Ave. Some of these concerns raised by residents apparently living less than a kilometre from the subject site. The draft South West District Plan also identifies problems with Cambridge Ave. However, Cambridge Ave is outside the scope of the proposal. We find it ludicrous that the impact of the project on a boundary commuter street is not addressed with the project's EIS.

3. As the GSC states, Liverpool has the potential to be a centre of knowledge-intensive jobs, housing diversity, with a health and education super precinct and attractive visitor destinations. This will not be achieved if major development such as the Moorebank Intermodal are assessed outside of this broader vision for the Liverpool Strategic Centre.

Flooding is a major constraint to the significant development pressure on industrial riverfront land close to Liverpool and there is urgent need for a comprehensive Masterplan for the Georges River. Further transport planning is also urgently needed to suitably locate the roads and bridges over the river which will be needed in the future and ensure they are outside the flood zone.

Flooding impacts and congestion will only be exacerbated by the close to 150,000 truck movements per day that this project will generate during construction and the almost 15,000 truck movements when it is operational.

Necessary work and response plans as proposed by the applicant are no substitute for the proper strategic planning assessment that this proposal requires. There should be recognition that the current environmental planning assessment requirements for State Significant development in NSW are weak and so to take account of potential future risks to life and property.

4. The protection of Sydney's Green Grid is of direct importance to the liveability and sustainability of Sydney but we would also argue its contribution towards Sydney's productivity - sediment-loaded and polluted waterways in western Sydney are expensive to manage, reduce property values, restrict opportunities for recreation and tourism and increase flood risks.

The protection of all sections of the Georges River, not just its wonderful downstream recreational areas, is crucial for the overall health of the river. It is disturbing that this proposal intends to remove vegetation, change ground levels and modify sub catchments, all of which will be detrimental to the contribution made by the Georges River towards Sydney's vital Green Grid much valued by the residents of Sydney.

5. According to the GSC in a recent document Towards our Greater Sydney 2056: "The Australian and NSW governments have agreed to work with local government on the development of a Western City Deal, a generational deal to deliver almost 100,000 jobs, more housing and better transport for outer Western Sydney in what is the nation's largest ever planning and investment partnership.

The NSW and Australian Western Sydney City Deal pledges to:

- target additional infrastructure investment to increase public transport and reduce traffic congestion, so people can spend more time with their families
- deliver more jobs closer to homes and services, with a focus on youth and Aboriginal training and skills development
- increase housing through better planning and density done well, and streamlining approvals across all three levels of government
- support clean air, green spaces, vibrant arts and cultural initiatives.”

A major component of the Deal is the second airport for Sydney but how the Moorebank Intermodal interacts with the proposed freight airport is unclear. We could find no supporting documents regard this.

Whilst we have no specialized knowledge in transport planning it would seem odd not to co-locate the two pieces of infrastructure. This would also seem logical in terms of the control of noise and amenity impact on nearby suburbs as well as reducing truck movements between the two transport nodes. It would also shift non airport freight closer to major arterial roads.

CONCLUSION:

We express disappointment that Australian and State government struggle with integrated and strategic planning as they develop necessary infrastructure. In this particular proposal we feel it will have major and unacceptable impacts on western Sydney residents. It undermines the shift towards strategic planning which was promised by the NSW government with the introduction of the Greater Sydney Commission.

There is the need for further studies, especially to take account of the second airport decision prior to any approval so as to ensure that it really is in the best location and interests of the future western Sydney as they negotiate the liveability of their parkland city.

Yours sincerely

Cathy Merchant,
Committee Member