

Dear Sir/Madam

We object to SSD 5066 Mod 2 and SSD 7099 Mod 1. The concerns related to the indirect impacts from the doubling the warehousing size.

Intuitively, doubling the warehouse would impact the traffic generation.

In the traffic generation calculations, the m^2 metric that is used. This corresponds to the area occupied by the building on ground of a building lot. Think of a single story warehouse.

If the m^2 metric is used, the calculation cannot differentiate between a one-story, 15-story warehouse or a 150-story high warehouse. The traffic generation remains the same, which is count intuitive.

The traffic generating calculations would have been more sensibly done using the m^3 metric, which would account for the height of the warehouse and its corresponding traffic generation.

Traffic issue

In our meeting on the 07/08/2020 with Mr Colin Langford (TfNSW), Anne Sutherland (TfNSW) and Asher Miners (Minister for Transport) we showed that once the new westbound bridge over the Georges River was built, the expected traffic volume on the M5 Motorway, underneath the Hume Highway is more than twice its capacity.

In that meeting, we were informed that the traffic modelling results will become available in about six to 12 months.

Behind our concern is that the last IPC approval to increase the 250,000 TUEs limit to 500,000 TEUs, was based on the fact that the transport infrastructure is able to handle the additional increased TEUs. But we have to wait another six to 12 months before we can learn if the transport infrastructure can indeed, handle the traffic.

Therefore, we strongly suggest that we wait for this modelling report before the Department does any more approvals.

Land use planning

We sincerely hope that this email is going to be read by someone who has studied at least one unit of land use planning, because the Moorebank Intermodal Terminal is an example of an extreme case of bad planning.

A city, about twice the size of Brisbane, is being planned in Western City. Many years ago, when Canberra was being planned, about 15% of the size of this new city, the best knowledge and best practises were used. From a planning point of view, geographically, the Moorebank Intermodal Terminal, is at the edge of this large new city. But it is on the other side of a river.

One of the universally accepted facts is, that freight should be carried by rail, except in NSW. Here we have a policy to carry freight by truck. Refer to Greg Cameron's media material. For Moorebank we have it both ways, rail the freight into Moorebank and then truck it to the destination.

In this new city plan, the freight train travels into the city, then crosses the river to Moorebank Intermodal Terminal. There the freight is unloaded, and stored in these warehouses, and later trucked out of Moorebank Intermodal Terminal, that is, back over the river, into the city.

There are two road-bridges over the river. These two bridges carry about the same amount of traffic as the Sydney Harbour Bridge.

To ease the traffic issues, TfNSW have proposed the new westbound bridge. In the meeting of the 07/08/2020, TfNSW alluded that a further two additional bridges may be needed to ease the road traffic, one additional bridge over the river and another bridge over the rail line.

Initially, only one rail-bridge was required. Now that has increased by three additional road-bridges.

From a planning point of view, is Moorebank Intermodal Terminal in the best location when it requires four new bridges? Surely, this is an extreme case of bad planning.

Economics

On paper, the Moorebank Intermodal is a great idea. (see the Moorebank Terminal Project, Detailed Business Case, 6 February 2012). The project would generate \$10 billion over 30 years. About 75% of the economic benefits would be derived from taking 3,300 trucks every day, off the M5 Motorway between Port Botany and Moorebank.

The only costs include (1) a rail-bridge over the river and (2) Moorebank Avenue would need to be upgraded 15 years after opening.

The public has already been made aware that Moorebank Avenue needs to be upgraded now, instead of 15 years after opening. The MICL EIS showed that taking 3,300 trucks off the M5 Motorway between Port Botany and Moorebank is not going to happen. In the recent meeting, apart from that one rail-bridge, TfNSW is considering three additional road-bridges to make the traffic work.

Surely, it must be time to reconsider the benefits and costs of this project in light of these new requirements.

Conclusion

Let us put further planning of Moorebank Intermodal on hold, and see what the transport modelling shows.

Then, do the costing of the additional road projects, and have another attempt at doing the benefit cost ratios. May be, there are other things that will generate greater benefits to the community in Liverpool and for Australia's taxpayers.

Kind regards

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