

Melanie Gibbons MP

Member for Holsworthy



21 August 2020

RE: Moorebank Intermodal Precinct West: Stage 2 – MOD 1 – Building Height Increase (SSD-7709-Mod-1)

To whom it may concern,

I write on behalf of the local residents in the Holsworthy Electorate, who I have joined with for over nine years, to voice our concerns on the negative impacts the Moorebank Intermodal will have on the local area.

We were already concerned with the original proposal, and it has become more detrimental with each subsequent application. The overall project has grown by increments, but if submitted in this form originally, I would be very surprised if it would have been approved. I ask you to see this, not as just a few changes, but as part of the larger, more impactful picture

This submission is therefore, in objection to the proposed Moorebank Intermodal Precinct West (MPW) Stage 2 – MOD 1.

The Stage 2 - Mod 1 proposal seeks to modify existing development consent for an adjustment to the operational boundaries for warehouse areas; amend the maximum building height from approximately 21m up to and including 45m; amend the noise criteria; and amend the criteria to allow for Dangerous Goods to be stored on-site.

I believe that it is in the best interest of the community that the MPW Stage 2 – Mod 1 application be rejected due to concerns with each amendment that is being sought in the modification application.

Height Increase

A major concern with these amendments is the impact of the increase in building height. In the visual assessment reports, each warehouse height increase is assessed individually. While it is all that is required for planning documents, this is extremely misleading for residents reading the documents, as it does not represent what the changes will look like in reality. They may therefore, be less likely to object as the true impact is not clear.

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Furthermore, viewpoint 6 for warehouse JR (NTS2) provides an outline of the building which shows that it is covered by heavy vegetation. This same outline is not applied to warehouse JN (UNDC), which is the building that is much more visible to residents. Not providing the outline of the warehouse in the JN (UNDC) visual assessment, makes it difficult to see the true impact it would have on residents due to lighter digital render covered partially behind a single tree. Taking the photograph from a few steps further to the side would also show a much greater visual impact.

The planning proposal reaffirms the visual assessment report, saying that the height increase is negligible, however it is contradictory as the increase in building height, when taken in isolation, is indeed significant.

Noise

The modification application seeks to increase the noise limit from 35 dB(A) to 39 dB(A). This is extremely concerning to the many residents who live less than 1km away from the site. While this increase is documented as a minimal change and as a noise level may not be extremely loud, these measurements do not take into consideration that new sounds are much more identifiable. Decibel measurements are not an accurate predictor of annoyance, and this can be verified by the many locals who are already being disturbed by the construction noises at the site. With 24/7 operating hours, I find it hard to believe that this noise will not affect neighbouring residential areas.

I understand that the noise and vibration impact assessment has stated that a noise wall will be constructed to help mitigate sound and its impact on neighbouring residential areas. Even with this included, an increase in the noise limit would still be needed. With the site already having multiple applications submitted, why was this level of noise not originally stated? Furthermore, how can residents know, that in two or three years' time, another application won't be submitted to increase the noise limit again?

Storage of Dangerous Goods

The biggest concern that I have, and locals have raised with me, is the approval and introduction of storage for dangerous goods at the Intermodal site. The planning proposal and supporting documents have stated that there would be a "significantly large number of small volume transportations of Dangerous Goods occur per week". As mentioned previously and in many prior submissions, the closest residential properties are less than 1km away from the proposed storage facilities. The report notes that there is a low risk for hazardous incidents, but with residents so close to the site, a report should have to indicate no risk, if this is to be approved.

When nearby Wattle Grove residents purchased their homes, many having done so over 20 years ago, there were no plans for a facility such as this to be on site. It is extremely unfair and unsettling to these residents, to potentially have dangerous goods stored so close to their homes, when there was no indication that an Intermodal facility would be built in the future.

Conclusion

The proposal notes that the modifications sought are "substantially the same" development. I find this hard to be true, as the increase in height is to allow for additional storage and improved operational efficiencies. This would create further changes to traffic conditions on our local roads, which are already set to be extremely congested from each of the previous approvals.

Additionally, an approval to allow additional noise and dangerous goods does not make this "substantially the same", rather, this development will now have further impacts that may negatively affect the community.

I have strongly objected to the Moorebank Intermodal plans and proposals for almost a decade and find it extremely disappointing that proposals and amendments continue to be put forward, without addressing any of the concerns that are regularly raised.

I continue to and will always firmly stand by my view, and the community's, that we are not the only location for a freight terminal of this scale, and we are definitely not the best option. I ask that you refuse this application and join with the community by halting any further impacts on us.

Yours sincerely,



Melanie Gibbons MP
State Member for Holsworthy
Parliamentary Secretary for Families, Disability and Emergency Services