

**From:** [REDACTED]  
**To:** [IPCN Enquiries Mailbox](#)  
**Subject:** Moorebank Intermodal West Concept Plan and Stage 1 MOD 1 & Moorebank Intermodal Precinct West Stage 2 submission  
**Date:** Tuesday, 2 July 2019 9:15:42 PM

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Dear Person,

I would like to state my objection to the planned project and its modifications. Thanks for the ability to comment on the proposal, as it gives an opportunity for some non-pecuniary independent input. I would enjoy commenting further and more extensively, but I have a job and a family and objecting to this is not my full time occupation.

Although stated by the Deputy Secretary that the site is suitable for the development, sadly the site abuts sensitive receivers, thousands of residents (compromised or otherwise), the fragile Georges River, threatened species habitats and shall negatively impact through traffic of the SW corridor, and shall contribute to congestion of several vehicular intersections including a particularly volatile hot spot for accidents of the M5 corridor.

Can the detrimental and negative effect of this development on the surrounds be minimised? Perhaps, and this is mandatory for the conditions of approval. But if there is no effective measurement, regulation and performance monitoring of the impact of the terminal, how will we know that the proposal meets projected conditions? Complaints? Fish kills? Prevalence of carcinomas in the years to come? Stringent regulation has been needed, is needed, and shall be needed in the future, starting with the most effective element of the hierarchy of control - elimination and the correct end of the application process - planning.

There are many reasons for an objection, and I feel as though a great number of the important issues I have omitted due to time limitations, but here are a couple.

### **Traffic**

Although the aim of the staged development is not to exceed the capacity of the road network (local, regional and state) there is no further indication of what will occur if the capacity is exceeded. As part of a minimal harm policy, it must therefore be that prevention is the best outcome with minimising a close second. Submissions from experts in the field have modeled this and have presented salient traffic facts from the genesis of this proposal *ad nauseum*. Is there sufficient provision of infrastructure to minimise impact? The roll-out of intersection upgrades will be sadly too little too late and create longer queuing times and contribute to commuter frustrations.

### **Need for appropriate controls**

The PAC must ensure that correct measures are in place to minimise harm to the populations that surround the development. Requirement to scrutinise and thoroughly regulate the development to minimise risk. Certainly in some aspects it appears as though

the development shall directly impact negatively on traffic, hydrology, air quality, flora and fauna, noise, etc. Happy for any development to be built in the vicinity - although this is not ideal - if the correct control measures are in place to minimise and manage risk, monitor outcomes and amend outputs to ensure compliance - harm through impact is minimised. Are there sufficient controls to minimise impact?

### **Air quality and noise**

Currently the NEPM is under a 2019 draft variation in which the goal is to *sic* "adequately protect human health and well-being". The population in the vicinity given basal exposure metrics can be defined in accordance of the NEPM as a "population at risk.". The operational phase of this development coupled with the tightening of ambient air quality limits will increase the exceedance of air quality indicators for the proposed development, making it more difficult for the proponents to meet current atmospheric air quality indicators. I trust the human health risk assessment includes the very fact and ranks it accordingly with appropriate control measures. Are there to be "blockout" days when regional exceedances are met in line with a "minimise harm" policy to a "population at risk" given the directly impacting activities of the proposal? It would be negligent for there to be otherwise.

I trust that the noise modelling data been adjusted for the anticipated elevation of 16.6m AHD. Higher elevation of transmission is one method of creating more impacting noise reception.

As part of the s4.38 of the EP Act development consent, conditions including minimise environmental impacts and set standards and performance measures for acceptable environmental performance with a requirement for regular monitoring and reporting exists. The ineptitude of the monitoring and reporting is sadly delegated to the under-resourced Council and suitability must be questioned given the resourcing of the council and the requirement of monitoring and reporting. Although this seems unjust as it will be an economic and resource burden on the council, there is good news - it shall be impartial, which is a good thing. No "massaged" reporting metrics to fit the limits of a model.

Not regulating diesel emissions (or fuel) to a "best (not good, not unregulated) practice" standard means negligently and persistently exposing every organism in the vicinity and through all mediums of water (runoff), soil (deposition) and air (direct atmospheric release of particulate and toxic gaseous) emissions - we all know the ones on this well worn path - PAHs included. Having accepted the development, there is a duty of care that must ensue to minimise the damage to the surrounding environment and the health impacts of exposure. I note that the reviewer of the air quality assessment did not have access to the raw results to compare the figures in his recently submitted report.

Point 10 in the draft SSD 5066 states "Locomotives that incorporate available best practice noise and emission technologies. Prior to construction of the rail link connecting to the

site, the Applicant is to submit a report to the Secretary for consideration and approval that has been prepared in consultation with TfNSW and the EPA that justifies the technologies proposed and how it meets the objective of best practice noise and emission technologies". I am not certain as to whether this report been submitted with consideration given to fuel efficiency (and less polluting) locomotives such as the GE Evolution series, or even a basal reduction in emissions from the adoption of AC traction motors. And this is technology that already is available on the market. Best available technology economically achievable (BATEA) is what is required as part of the consent, and this is also pertains to the outfall of diesel emissions and noise generation. Is there sufficient provision/regulation to minimise impact?

Robust controls require researching and implementation. Appropriate and precise monitoring by a relevant authority is needed, which includes measurement, collation, interpretation and reporting of data. Finally the ability to review and amend processes as part of a feedback loop, all in with the aim of minimising harm. These people of the Liverpool LGA are already a compromised population identified as being "at risk," with the effects of this development extending well beyond the immediate vicinity. The area needs nurturing, not neglect. This is the opportunity to commit to a sensible approach to this for the future, so all sides may benefit from this (or at worst, be harmed to the least extent), not just one. This is true for all aspects of the proposal, and it starts with intelligent planning.

For the reputation of the proponents and the PAC, the operation of this project **needs** to be designed, planned and approved as the industry flagship development. This could be an exciting opportunity for freight handling in this country. Sadly, it is seen by many, and reinforced to some extent from the deception and unwillingness of the proponents to embrace this proposal as an opportunity, as a threat to the community. As a threat to the environment. As a threat to employment. As a threat. Not as an opportunity. Not as something that will give back and contribute. It is a harmful reality that will ensue years down the track when retrospectively there could have been the saddest words of song or pen - "it could have been." I fear we have reached that already before this finishes with other movements in the industry gathering momentum and seizing that very opportunity.

David Mawer

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