

Melanie Gibbons MP

Member for Holsworthy



4 July 2019

Ms Dianne Leeson
Chair
Independent Planning Commission
ipcn@ipcn.nsw.gov.au

**RE: Moorebank Intermodal Precinct Application Numbers
SSD-5066 MOD 1 & SSD 16_7709**

Dear Ms Leeson,

I write on behalf of over a thousand residents who have shared their views and concerns to me about the Moorebank Intermodal over the past eight years.

This submission is in objection to both the proposed Stage 1 Early Works Modifications and Stage 2 development proposal for the Moorebank Intermodal Precinct West (MPW).

The Stage 1 modification and the Stage 2 development seek to increase the size and scale of the MPW. These proposals are not appropriate for this area and do not take into account the best interests of the local residents. It is my belief, therefore, that these proposals should not be approved.

I believe that the proposals for the MPW will have detrimental effects on the community, especially those residents in the suburbs of Wattle Grove, Holsworthy, Casula, Glenfield and Moorebank.

I would like to outline that both applications will have serious implications to our local area, which includes the following outlined below.

Dust/Air Quality:

The current proposals lack sufficient information relating to the health impacts that may occur throughout both the construction and operating phases of the development, specifically issues such as heavy vehicle pollution and dust suppression from the proposed crushing facility.

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Both the Air Quality Assessment and Biodiversity Impact Assessment for the modification of Stage 1 and for Stage 2 note that there will be negative effects on the air quality for our area, however say these are minor in comparison to background conditions.

The Biodiversity Impact Assessment highlights that dust pollution from the Stage 1 modifications, if left unmanaged, has the potential to reach higher levels than noted in the original proposal. This is particularly concerning, with many residents already worried that the current levels of dust produced from construction will impact on their family's health, as well as negatively impact on surrounding biodiversity. With these increased levels of dust in the air through earthworks, as well as crushing of materials, stronger and more reliable measures must be presented before any approval is considered to ensure residents and surrounding biodiversity remain unaffected.

Stage 2 of the MPW is set to introduce over 40,000 tonnes per annum of CO₂ into the area, and this does not include emissions produced from heavy vehicles travelling to and from the site.

The community and I do not believe anything contributing negatively to local air quality should be approved. Areas of South-West Sydney already have lower air-quality and higher asthma rates in comparison to the rest of Metropolitan Sydney, this development should not be allowed to further contribute to this.

Traffic:

Within the proposed modifications to Stage 1 is an extension of working hours. These extensions, which include the evening period between 6pm-10pm on weekdays and Saturday afternoons between 1pm and 6pm will further strain our local road networks and the M5 with a projected 1680 light and heavy vehicle trips to occur every day.

This will unnecessarily lead to extended travel times for local residents returning home from work in the evenings, as well travel in and out of the area on the weekend. Many residents have come forward highlighting their concerns regarding this, however they do not appear to have been taken into consideration with the initial Stage 1 proposal having been approved.

Our local traffic modellers have found that the additional traffic will add congestion around the hospital and Liverpool CBD, slowing down movements for emergency services and locals around these areas.

In addition to this, further developments to the precinct through Stage 2 will result in continued traffic issues that the existing roads cannot support, with a recent NRMA survey highlighting Moorebank Ave/M5 as the most congested area in Sydney. As noted in my previous submission relating to the MPW, at least \$1B of upgrades is needed to be undertaken for this proposal to be effective. With none of these upgrades currently

underway and the original Stage 1 application already approved, traffic issues in the area are set to worsen, with no sign of it alleviating into the foreseeable future. Therefore the approval of the modifications to Stage 1 or Stage 2 are not suitable and these proposals should not be considered, at least until these upgrades are underway.

Noise:

The construction and operation of the MPW has the potential to create additional noise, disturbing residents in the surrounding areas. Many residents have already contacted me relating to noise issues surrounding current construction on the site, and believe this is set to worsen if these proposals are approved. While the Noise Impact Assessment provided states that sound increases are not substantial and in line with regulatory standards, it follows a number of assumptions that may not actually be followed during the building and operation phases. If compliance monitoring does not occur and/or workers do not follow standards set out in the report, these noise levels are set to disrupt residents.

There are also noise concerns regarding the proposed crushing plant, with the Noise Impact Assessment failing to include information relating to this. A future crushing plant has the potential to create high noise levels and if not assessed at the proposed location can negatively affect residents potentially in proximity to the plant.

The height of the site has been increased significantly with fill. The noise surveys should be redone with the new heights taken into consideration, as they would have different outcomes, and may have a greater impact on some residents and may also extend further into the community.

Environment:

The proposed modifications through Stage 1 and the further expansion of the MPW through Stage 2 have the potential to create negative environmental impacts to the local area. This has been raised by a number of locals in the community, many of whom highlight our surrounding flora and fauna as one of the great assets of our local area. The modification to Stage 1 will see an increase in impacts on our local biodiversity, while Stage 2 will have a minor impact on threatened and endangered species in the area. However minor these may be, this biodiversity is viewed as an integral part of the local community and should be preserved.

South-West Sydney is also home to a substantial proportion of NSW's koala habitat. The clearing, and increased number of heavy vehicles, combined with the increase in pollution projected from the operation of the site is counter-productive to the State Government's NSW Koala Strategy. While the proposal notes no koalas, or other protected species were located on site, this investigation was undertaken in 2010 and is not representative of any possible changes in recent years.

I also find it hard to believe that this land would not be koala habitat, as it is surrounded by areas where they have been spotted, such as the defence land and on the Gandangara Aboriginal land. With minimal koala habitat remaining in the local area, reduction of further habitat, whether occupied or not would go against community expectations and values for biodiversity in the area.

The proposed location for Stage 2 covers land currently occupied by the *Hibbertia Fumana*, a critically endangered species considered extinct since the 19th century. Further studies have occurred since, and an offset area has been identified to relocate the species to ensure it survives. Although offsetting species of significance is common for developments of this scale, the *Hibbertia Fumana* is unique in the sense that this is the only place it has been found and was previously thought to be extinct. In cases such as this it is critical that fauna remains in the location it was found and to give a better chance of survival. It is imperative that modifications are made to Stage 2 to ensure that development does not take priority over endangered native species such as this.

Conclusion

After multiple objections from the community and myself, it shocks me that Stage 2 may progress without any plans to ease traffic or congestion. I continue to stand by the community in the view that the MPW will not only contribute to worsening traffic within the area, but also lead to a number of negative environmental, health and social consequences.

This project has continued to be branded to have “a positive impact on national productivity” and provide “long-term public benefits” however with the initial phases of construction for Stage 1 occurring, it’s evident that these public benefits will not be seen within our local community, and they will be outweighed by negative impacts.

The local residential communities should not be over-looked just because this may be viewed as a convenient location. Both Eastern Creek and the future Badgerys Creek Aerotropolis should still be considered for an Intermodal of the proposed scale, as both locations have substantial space, are in more convenient locations for the broader freight network and do not impact on a large number of residential communities.

I continue to 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.

Yours sincerely,



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