

We have reviewed the SIMTA EIS and it is with great concern that we submit the following comments. We would be very happy to discuss and defend these comments with relevant parties.

As a minimum I would expect some sort of reply indicating that you have read the following comments as it has taken weeks of our time to revise the 29 documents available on this issue and even more time putting it into some form that is understandable.

The EIS has stated that there will be horrendous traffic problems but this seems to be ignored in their summary, which is what most people read. They do not say that they will be fixing these problems in order for them to be able to operate. Who will be paying for the cost of fixing these huge traffic issues? It could run into billions of dollars. This seems to be an awfully high figure when it is considered that the government is in debt by 30 billion.

We are very disappointed with the SIMTA (Sydney Intermodal Terminal Alliance) EIS as it has not addressed the issues we raised in our book 'Moorebank Intermodals Key assumptions require deeper scrutiny'.

http://lcit.com.au/wp-content/uploads/2013/06/Intermodals_Book_Web_V19.pdf

We plead once again for these studies to be done correctly and we ask, for the sake of the Australian taxpayer, that the plans necessary to improve the infrastructure, in order to allow the Intermodal to operate, be costed and revealed to the community.

I simply do not understand how such a huge development, that will have profound effects on the community, be allowed to go ahead without having the correct studies being done on it! This is not democracy or science. It does not make sense!

Comments on the EIS for the SIMTA Development

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1 Economic Benefits are Calculated Incorrectly

The economic analysis has used the incorrect base case (the situation without the development) so resulting in an artificially high reduction in pollution and unrealistic economic savings.

Some people find this a little hard to understand which, no doubt, is why the misleading figures continue to be propagated.

1.1 Incorrect Economic Base case used by EIS consultants

The figures below, schematically illustrates the ‘Economic Base’ case and the ‘Improved (Intermodal) Case’ used by the consultants evaluating the delivery of containers from Port Botany to the destinations in the SIMTA catchment area. The base case wrongly assumes that containers must come to Moorebank (shown by the green line) and therefore must be double handled. The base case should be representing what happens now. This is not what is happening now. Trucks do not take containers to Moorebank first and therefore containers are not double handled. This is not the base case!!!! **How can anyone think that this is the base case? How can the consultants use this as the base case?**

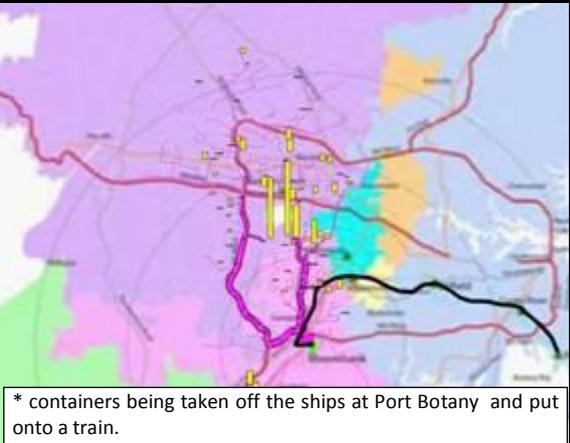
Table 1 The Incorrect base case and Intermodal case assumed by the consultants.

	
<p>* containers being taken off the ships at Port Botany and put onto a truck. *at Moorebank, containers are transferred from the Port Botany trucks onto trucks, which take them to the final destination.</p>	<p>* containers being taken off the ships at Port Botany and put onto a train. *at Moorebank, containers are transferred from the train onto trucks, which take them to the final destination.</p>
<p>Economic Base Case</p>	<p>Improved Case</p>

This is definitely the wrong Base Case. Not all SIMTA’s containers need to go to Moorebank first.

The containers start from Port Botany, where the containers are lifted from the ships, and then the containers must end at their final destination.

The Base Case MUST model the ‘no change’ or ‘do-nothing’ scenario, that is simulate what is happening now. The no-change case, is where the containers are taken off the ships, put on a truck, which take them to the final destination.

	
<p>* containers being taken off the ships at Port Botany and put onto a truck which take them to the final destination.</p>	<p>* containers being taken off the ships at Port Botany and put onto a train. *at Moorebank, containers are transferred from the train onto trucks, which take them to the final destination.</p>
<p>Figure 3 Do-Nothing Case</p>	<p>Figure 4 Improved Case - same as Figure 2</p>

Now the costs can be clearly seen:

- Double handling at Moorebank – costly in time, labour and machinery

- Traffic congestion around Moorebank

Double handling is extremely significant as, in this age, goods are required to arrive at their locations as quickly as possible and if goods are held up firstly waiting for the Port Botany-Moorebank rail to take them to the intermodal, and secondly held up once again waiting for them to be transferred onto the final delivery truck.

The containers will be significantly delayed in comparison to leaving directly from Port Botany. This cost in delay needs to be estimated in the cost of running the intermodal.

The fact that double handling is assumed in the Base Case, so that it can be cancelled out in the Improved Case, is preposterous.

Please try to understand this is totally WRONG and therefore the economics of the intermodal is wrong!!!!

If you look at where the containers are needed and I refer to the figures below and to the book 'Moorebank Intermodals Key assumptions require deeper scrutiny' Page 10 and 11,

http://lcit.com.au/wp-content/uploads/2013/06/Intermodals_Book_Web_V19.pdf

you will see that only 0.1% of containers are needed at Moorebank. Containers are required in locations a long way from Moorebank.

1.2 Flaws in the economic analysis used by SIMTA EIS consultants:

- The road infrastructure is assumed to cope with all the truck traffic. Please refer to the book 'Moorebank Intermodals Key assumptions require deeper scrutiny', for further explanation of the urgent need for road upgrades presently without huge extra volumes of traffic being loaded onto them.
- It is assumed that the double handling of containers (in the Base Case: truck to truck), in the Improved Case (rail to truck), effectively cancels out which is totally wrong.
- The congestion due to the truck traffic between Moorebank and the final destinations are identical, and can therefore be 'cancelled out'. This is wrong as the trucks do not need to come to Moorebank in the first place.
- There is an issue of timing of the container delivery:

- in the Base Case, there would be a steady stream of trucks, carrying containers between Port Botany and Moorebank trucks.
 - Therefore the time for delivery for each individual container is a function of the Port Botany truck loading time, truck travel time, and double handling time to transfer the container to the new truck, and final delivery time.
- in the Improved Case, the containers would arrive in bulk on each train set.
 - Therefore the time for delivery for each individual container is a function of the Port Botany train loading time, rail travel time (few trains per day), and double handling time to transfer the container to truck, and final delivery time.
 - While the 'average' time may be used, consideration should be given to the variation of the average. Consider the last container to be double handled!

Because time is lost in the improved case this should be included in the economic analysis as a dis-benefit.

- trucks are moved off the M5 onto rail. In reality many of the trucks did not need to be on the full journey to Moorebank on the M5 in the first place so how can they be moved off???
- 2,700 for SIMTA, and 3,300 for Federal Government
- Reduction in pollution (decrease from trucks, but increase from rail).

The economic analysis needs to be done again taking into account the current mistakes.

Proper economic analysis, the Do-Nothing Case should be compared to the Intermodal Case

A simple back of the envelope calculation shows that the difference in truck km between the Do-Nothing case and the Economic Base Case, is about an increase of 2,000,000 km per year. This equates to a lot of extra fuel that should have been considered by the economists.

The other issue is the additional cost of double handling of 1,000,000 containers at Moorebank. This double handling is expensive in labour, machinery and time, and should have been added to the final delivery time and cost.

Also, when the modelling shows that intersections with an average delay of nearly 7 min per car are produced, we need to question the ability of the network to cope.

The cost of infrastructure improvements needs to be included in the economic analysis.

2 Inaccurate Estimates used to Artificially Hurry the Intermodals Along

It is thought, that once Port Botany's TEU's reach 3 million then an intermodal such as Moorebank needs to be built. SIMTA has worked out that the 3 million freight movements will occur at Port Botany by 2016.

This is why there is a panic to build the intermodal.

However, if the historical data is examined correctly, it can be seen that the 3 million TEU's will not be reached until about 2020-2022. This date has been achieved by extrapolating data from the Freight Infrastructure Advisory Board (FIAB) from the July 2005 report.

For the financial year 2012-13 SIMTA's estimate was about 17% higher than was recorded from actual data from 'Sydney Ports'. The FIAB had also estimated the future freight patronage and when it was compared to actual values it was found to be about 3% lower. SIMTA did not use the FIAB's estimates. Why not?

It is interesting to note that Eastern Creek is to be developed at about 2020-2022 point in time.

Eastern Creek could certainly take a lot of the TEU's that are being forced upon Moorebank. Eastern Creek is a closer location for many of the container destinations.

3 EIS Shows 1km Traffic Queues on 12 of 13 Intersections Studied

The SIMTA EIS shows that the infrastructure is not able to handle the future background traffic, let alone the additional Moorebank trucks.

Refer to Appendix-G4-Transport-Traffic-Assess-Vol2-Part3.pdf, Technical Note 5.

The EIS has incorrectly stated that there will **not** be much traffic resulting from the Intermodal:

The technical studies found that the impact of traffic from the terminal on roads outside the immediate area to be insignificant" quote from the

Liverpool City Champion, page 8, in the article: See terminal concept, by Farah Abdurahman.

This is incorrect as we have explained in our book

‘Moorebank Intermodals Key assumptions require deeper scrutiny’

http://lccit.com.au/wp-content/uploads/2013/06/Intermodals_Book_Web_V19.pdf

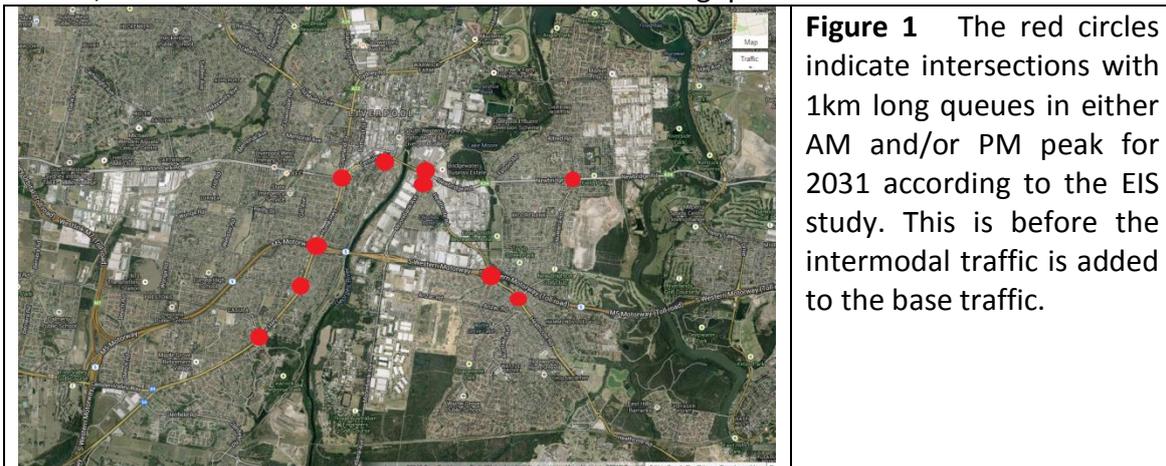
Briefly this is because the intermodal traffic used by the studies does not include

- Warehouse traffic coming from within the site
- Warehouse traffic coming from secondary sites located close the intermodal facilities

3.1 Base Case Already 1km Queues on 10 Intersectionsfor 2031

The base case is what will happen to the traffic without the intermodals. It is also known as background traffic. That is if nothing changes, this is what the traffic would look like in 2031.

The EIS report on the Base case 2031 shows that, of the 13 intersections analysed, 10 will operate at a Level of Service F, either for the AM or PM peak. In non-technical terms, that means these intersections have 1km long queues.



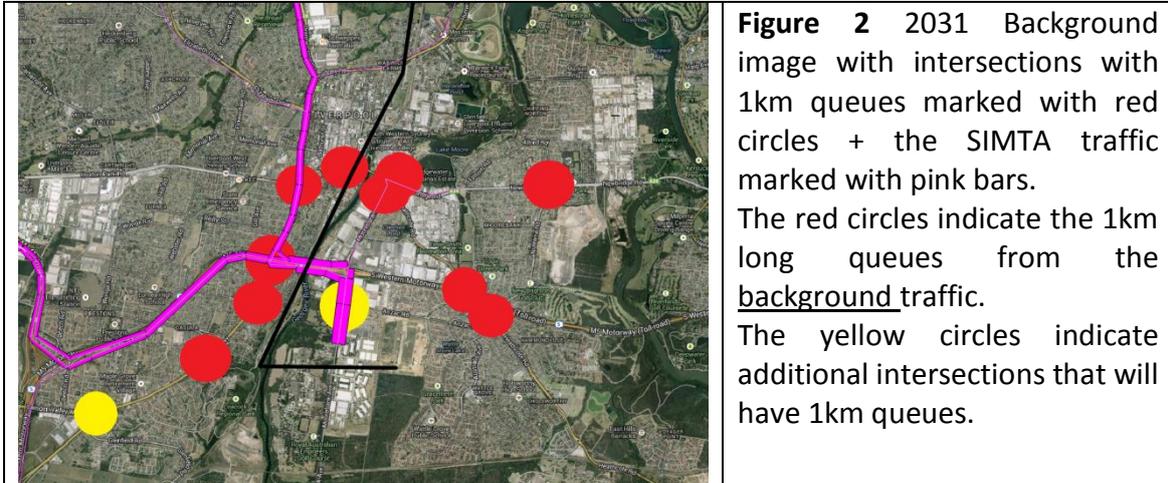
Level of Service “F” is the highest congestion/delay that transport modelling packages generate. Obviously, to calculate a higher congestion level is fruitless as we already have queues at 1km in length.

Mathematically, it is very easy to calculate queue lengths. However, whether the queue length is 825, or 1,988.5 m long, is purely academic. When these lengths are converted to seconds delay, large delay numbers are generated. For non-academic people there is a threshold value of acceptable delay. Level of Service F represents the point where the delay is so large that it becomes meaningless.

In real life, road users would avoid such intersections, because such a severe level of congestion affects a whole region. The queues are so long that that it impacts the surrounding intersections, which in turn impacts other intersections.

3.2 Future Case (Intermodal) More Infrastructure Necessary

When the SIMTA trucks are loaded onto the network, we find than 12 of the 13 intersections record the Level of Service F. This is shown in the figure below.



This figure shows 12 of the 13 intersections with the Level of Service F = intersections with 1km queue lengths.

Two additional intersections become Level of Service F.

- The Anzac Pde – Moorebank Av is obvious, because this is outside the intermodal.
- The Hume Highway / Camden Valley Way intersection however, is strange. The pink lines in the Figure above represent the “shortest path” for the trucks to go to and from the intermodal.

This indicates that the network has been improved on Cambridge Av, so that this path has become attractive.

The 13th intersection in the list of intersections examined is the Moorebank Av – M5 Motorway intersection.

4 Moorebank –M5 Motorway intersection will not Carry trucks?????

The EIS states that

The Moorebank Av – M5 Motorway intersection will remain unaffected by the truck traffic “Anzac Road is expected not to carry trucks generated by the SIMTA Proposal”.
See Technical Note 5, page 20 (Appendix-G4-Transport-Traffic-Assess_Vol-2-Part3.pdf).

Obviously, an alternative M5 – Moorebank intermodal connection has been modelled but this has not been explained in the report. What is the alternative? Where is the alternative? Who pays for the alternative?

5 EIS Traffic Model Shortcomings

5.1 Study area does not include worst accident spot in Sydney

SIMTA has estimated that 27% of the truck movements would travel north on the Hume Highway. This was clearly shown in Figure 7-6 Inbound Truck (Rigid and Articulated) Distribution to Site during AM Peak. See page 105, Appendix-G1-Transport-and-Accessibility-Impact-Assessment.pdf

The importance of noting this issue is that about 1 km north of the study boundary limit, is Sydney's worst accident hot spot. This fact is highlight in the book" Moorebank Intermodals, Key Assumptions Require Deeper Scrutiny", on Page 22. This book has been widely distributed, has been publicly commented on, and has been freely available by downloading it from this site.

What were the reasons for NOT including this small section of Hume Highway?

Please note that the EIS gives the very strong impression that the Hume Highway has been studied. Those references relate to the Hume Highway south of the M5 Motorway, and NOT to the section with the highest accident hot spot. The highest accident hot spot is known as Copland Street and doesn't appear in the EIS document.

5.2 Old Population Data Used

Appendix-G1-Transport-and-Accessibility-Impact-Assessment.pdf, page 74

The experts used the 2008 Release Population Projections and the 2010 Metropolitan Plan in their modelling work.

The August 2012 Population, Workforce and Employment forecast were available at the time when this modelling work was done.

What were the reasons for NOT using the latest population, workforce and employment forecasts?

5.3 TfNSW Claims that Truck numbers should be 10 Times More

In the TfNSW submission, Section 6.5 "Truck traffic generation – what the response to submissions should provide", quote '... will generate 20,700 daily truck movements. This is ten times more than the truck generation estimated by the SIMTA proposal.' unquote.

It is likely that the RMS estimate of 20,700 appears to be based on the combined traffic from SIMTA and Federal Government IMT combined.

Robin Renwick, First Assistant Secretary, Moorebank Project Office, Department of Finance and Deregulation, on 14th November 2012, stated in his speech at the Liverpool Chamber of Commerce, that some 1250 ha of potential warehousing around Liverpool is available to support the Moorebank Intermodal.

Obviously, having such a large warehousing area in a symbiotic relationship with the Intermodal will generate traffic. The total traffic resulting from the intermodal would be in three parts:

- traffic resulting from between the 1250 ha of warehousing and the Intermodal
- traffic that comes into, or out of, the intermodal itself to pick up or deliver containers and the intermodal workers.
- traffic generated from the maintenance of the intermodal site, which would typically be done by external contractors.

Clearly, the traffic coming from warehousing associated with the intermodal is very significantly higher than the traffic from the intermodal itself. Both the RMS and Robin Renwick implied this definition.

Because the traffic associated with warehousing outside the intermodal will add very significantly to the traffic, SIMTA only records the “intermodal traffic”, for this would have less impact on the infrastructure than having to include both sets of traffic.

Residents, and hopefully the NSW government, are interested in the total traffic associated with the intermodal.

Further assumptions to reduce traffic generated from the intermodal include:

- assuming that each truck leaving the warehouse is filled to capacity (This means that there would not be extra trucks required to take the contents of the containers away and therefore less traffic would be generated)
- assuming that there are no empty containers being filled. Again this means that fewer trucks are coming to the intermodal to fill the containers.

This may actually be the case although it is unlikely. It is, in fact, irrelevant because the symbiotic 1250 Hectare of land in close proximity will do both of these things therefore increasing the traffic generated due to the presence of the intermodal.

5.4 Possible Future Scenario of 300 000 people in the South West is not used in Traffic Modelling

The EIS makes many points about the importance of this development for the growth of NSW.

The report 'First Things First', put out by Infrastructure NSW, is based on a scenario of having an increase of 300,000 people in the south west, and 300,000 in the north west of Sydney, and having about 200,000 more people employed in Global Sydney.

Clearly, such a scenario is a new one for the NSW government. The modelling team could have taken that on board, and made a quick assessment on the impact of this on the M5, and used that as a sensitivity run for their modelling.

Given that the M5 Motorway is one the critical linkages between the south west and Global Sydney, this should have been one of the sensitivity runs.

Would the Moorebank Intermodal still work under such a scenario?

5.5 Model Documentation does not Report on Road changes or Statistics used for the modelling

A massive amount of transport and traffic modelling has been undertaken for this work. The TransCad software was used for the strategic modelling, and the Paramics software was used in the two models: Inner Core, and the Inner Area.

The single most disturbing issue is that the EIS does not report on the most basic and elementary network statistics. Such simple statistics as the total in the travel demand, network lane km, network link km, total vehicle hours travelled, total vehicle km travelled, and for the Paramics modelling simple statistics such as how many vehicles could not enter the network.

This means that the readers of the EIS have absolutely no idea what traffic demand has been used and what network changes have been made.

There is no indication of the background demand, SIMTA intermodal demand, traffic associated with the intermodal demand, nor the contribution these travel demands make towards the traffic congestion.

It is blatantly obvious that network changes have been made, but these have not been documented clearly. For example,

- Currently, the path of Cambridge Avenue has a culvert over Georges River, which floods from time to time. In the future, this link has become such an attractive path that many use this path. So much so, that the Hume Highway / Camden Valley Way intersection which is at the other end of the path, turns into a Level of Service F (an intersection with a 1km long queue).
- A single reference is made to the SIMTA – M5 link: "Anzac Road is expected not to carry trucks generated by the SIMTA Proposal". Obviously, the modellers have added a SIMTA to M5 Motorway connection for the trucks. See *Technical Note 5, page 20* ([Appendix-G4-Transport-Traffic-Assess_Vol-2-Part3.pdf](#)).

6 Not Reporting on Costing of Improvements

It is extremely difficult to accept that NOT reporting the most basic model statistics, and not costing the network improvements are “oversights” by the world leading professional experts.