

SUBMISSION TO TRANSPORT FOR NSW DRAFT NSW FREIGHT AND PORTS PLAN(F&PP)

Lynda Newnam laperouse@bigpond.com 25/3/2018

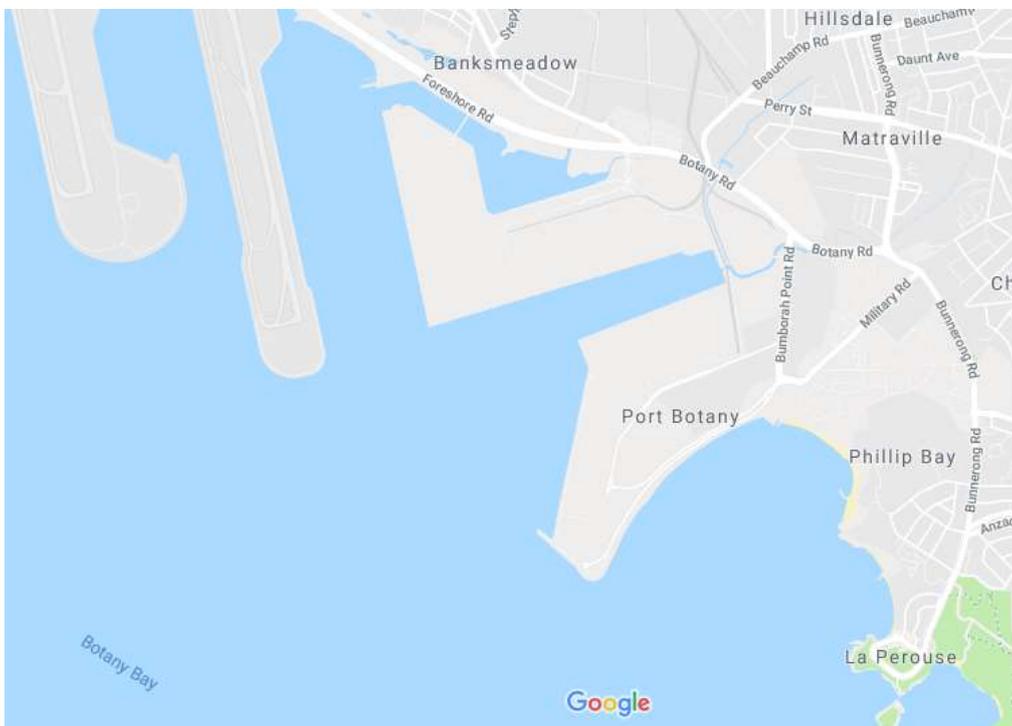
The transport and logistics industry is one of the key drivers of the Australian economy. The Australian land transport industry delivers significant value by moving people and freight from where they are, to where they are needed, at the time they are needed. On an average day in Australia, the sector moves:

- *passengers more than 1.15 billion kilometres – equivalent to an average daily distance of 49 kilometres per person; and*
- *nearly five million tonnes of freight – equivalent to approximately 200 kilograms moved for every personⁱ*

I live across from Port Botanyⁱⁱ at La Perouse. This is my neighbourhood. I understand the impacts eg. air qualityⁱⁱⁱ, road congestion and safety^{iv}, biosecurity, restrictions on recreation, water quality. I understand the importance of addressing those challenges so that the pricing of freight accurately reflects the full cost, i.e. negative externalities not borne by selected communities living port-side and along freight corridors. ^v

At the same time, I recognise the economic importance of the freight task and understand the need to preserve port-side land and corridors and to maintain buffer zones around these. Buffer zones can reduce noise impacts, improve air quality outcomes and facilitate easier movement. Active transport corridors, for example, can be incorporated into/or form buffer zones.

I also understand the importance of social licence.^{vi} **Social Licence** is underpinned by trust, transparency and accountability and developed through respect and collaboration.



THE PLAN

These Plans are central to delivering strategic priorities for NSW, including the Premier's stated priorities:

- *grow the economy, accelerating major project assessments and delivering strong budgets*
- *build infrastructure and deliver better services, improving road travel, reliability and on time public transport running*
- *create safer communities, reducing road fatalities by at least 30% by 2021 based on 2010 levels. (page 9 F&PP).*

Let's begin with **transparency**. Here we have a 'plan' for managing the freight task to 2056 yet it is unclear what that task for container movements in and out of Port Botany is projected to be. We are told that

Freight in Greater Sydney is expected to double over the next 40 years and increase by 25% in Regional NSW over the same period. (page 15 F&PP)

Page 26 F&PP



Figure 16: Freight Task in NSW

And this (as per the Figure 22, below) will be the projected **combined** trade through Port Botany and Port Kembla. There is no breakdown.



Figure 22: 30 years trade forecast – combined trade through Port Botany and Port Kembla

In the preface to the Draft Future Transport Strategy 2056 (FTS)^{vii}, Ministers Constance and Pavey state that Sydney’s freight task will ‘double’ by 2056.

*By 2056, NSW will have 11.2 million residents and be the country’s first trillion dollar state economy. Sydney, one of the developed world’s fastest growing cities, will be a global city similar in size to London or New York today. This growth will mean our networks will handle 28 million trips a day **and double the current metropolitan freight task**^{viii}.*

Note that on Transport for NSW’s (TfNSW) low growth projections the volume for containers is at 7 million TEU not 5 million TEU which is effectively what double the current throughput represents. For year ended 30th June 2017 NSW Ports throughput at Port Botany was 2.43 million.^{ix}

“Road and rail network improvement and development to serve **Global Gateways in Newcastle and Port Kembla will be linked to anticipated freight growth and the need for an overflow port once Port Botany reaches capacity. On a range of scenarios, Future Transport expects this will occur between the early 2030s and mid-2040s**, depending on rates of trade growth and the productivity of the Port Botany interface and supply chains.” (page 85 FTS)

Case Study: Planning a second container port

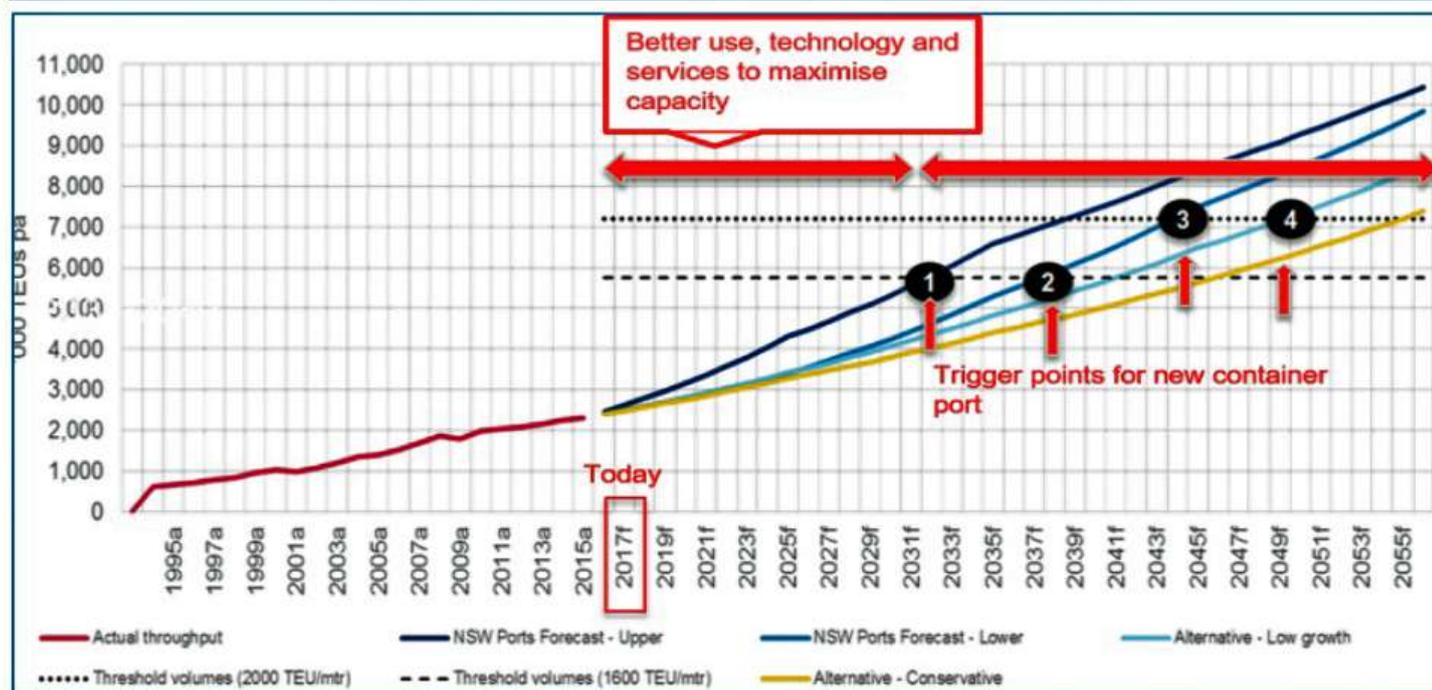


Figure 77 Trigger points for a new container port

(page 106 FTS)

Effectively, TfNSW state that Port Botany's capacity is around 5 million TEU. In the NSW Freight and Ports Strategy released 4 years ago ^x TfNSW predicted around 11 million TEU by 2036-37 (page 83) which is more than double the projection in the FTS.

This is significant, because when Port Botany was approved for expansion in 2005 the cap was set at 3.2 million. The Environmental Impact Statement was based on a cap of 3.2 million and the approval was conditional upon a new Environmental Impact Assessment being undertaken and supporting a cap rise. However, no assessment occurred before the cap was abolished through an act of Parliament in November 2012. The 65 ha of Botany Bay and Botany's only beach were destroyed^{xi} so another million TEU could be added to the already projected capacity of around 2.2 million^{xii}.

Under the Ports Growth Plan (2003) ^{xiii}:

'When Port Botany reaches capacity, Newcastle will be the State's next major container facility.' ^{xiv}

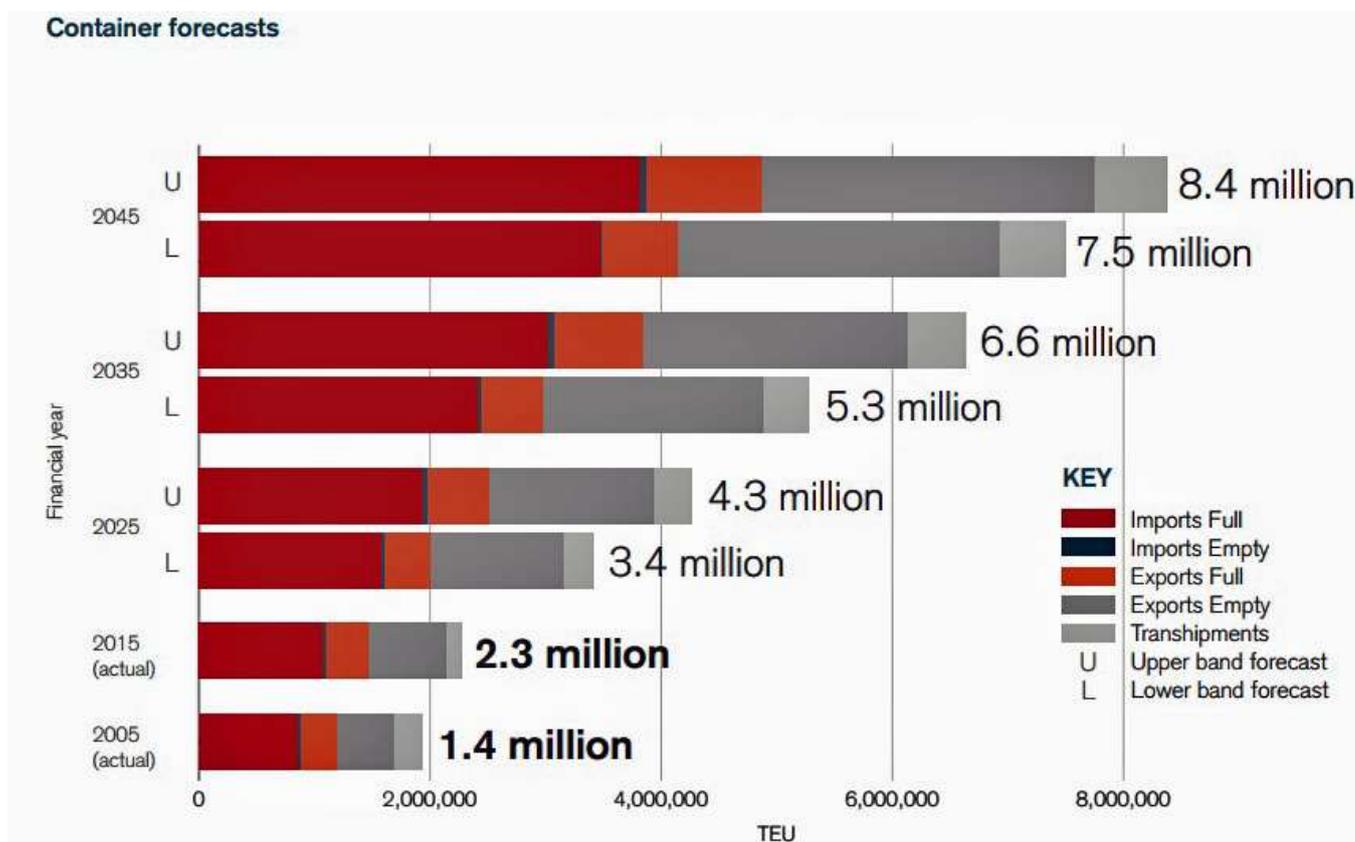
Then we come to the **Greater Sydney Commission's (GSC) Eastern District Plan ^{xv}** and the expectation is that:

Port Botany and Sydney Airport will grow significantly – with the container traffic at Port Botany projected to grow from 2.4 million to 8.4 million containers by 2050 (page 68 GSC)

And further:

The NSW Department of Planning and Environment is reviewing planning controls for land surrounding Port Botany to enable continued operation and to minimise conflicts with sensitive land uses. In addition, planning for buffer zones around the precinct must improve. (page 70 GSC)

The NSW Ports 30 year Master Plan (NSWP) ^{xvi} on page 37 has a forecast of 8.4 million for 2045 as opposed to 7.5-8.4 million by 2050 for GSC and combined Port Kembla/Port Botany 8.4 million for 2056 in F&PP different again to the FTS figure.



There is no detail on **Empty Containers**, mentioned on page 32 F&PP. This is a challenge worldwide and there should be data on the impacts of numbers above what is required for export. It is an inefficient use of road space in congested Sydney and export through other ports, such as Newcastle and Kembla should be explored.

Rail Constraints

There is no mention of double-stacking and why this efficiency cannot be achieved from Port Botany. ^{xvii} This should be discussed with reference to Inland Rail. ^{xviii} The impact of unregulated locomotive emissions has not been included.



Waste is growing, currently at 5% of total freight, page 60 F&PP, yet there is no mention of how Councils need to change practices in local recovery. This requires community input and collaboration

Intermodal Terminals

There is plenty written about the importance of **intermodal terminals** and the need to protect freight corridors (see eg. page 66 F&PP below)

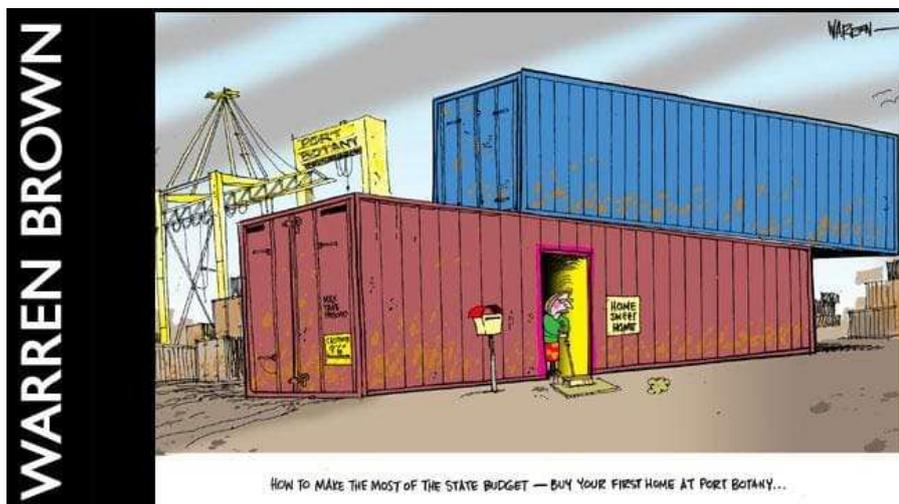
The direction for this Priority Action Area is to improve reliability of freight movements by providing greater access to the shared road and rail networks, and ensure that on our busiest freight corridors the rail network will support 24/7 access for freight.

However, there are no projections on container throughput at intermodals. Given the trade projections for Port Botany and even combined Port Botany/Port Kembla^{xix}, it would be expected that the current caps at Enfield and Moorebank would be raised and/or an additional intermodal would be built around Eastern Creek as proposed in *Railing Port Botany Containers (2005)*. The thinking around this should be shared in documents such as this and in the Greater Sydney Commission District Plans. It is important when considering population density growth in a particular area to have confidence in the planning regime. If, for example, an intermodal has been conditioned for 1 million TEU, then the cap should not be raised unless there is genuine **'environmental capacity'**. There is unlikely to be such capacity in Wattle Grove and Enfield, and yet given the experience with the Port Botany Expansion cap (Conditions of Consent 2005) it is more than likely that significant pressure would be applied for caps to be raised or abandoned.^{xx}

The Future

This is a Plan with a 40 year horizon – 2056 - yet there are few references to autonomous vehicles and the radical changes in work and leisure patterns. These will revolutionise how goods and people move around and when and why they move around. And yet the tone of this document is 'business as usual' with a few changes around the edges. Furthermore, not only is this revolution receiving minimal attention but the opportunity to generate 'excitement' is ignored.^{xxi} Even more critical is **Climate Change** which doesn't even rate a mention. I made reference to Climate Change in my submission to the 2013 plan which was on exhibition prior to the finalisation of the lease of Port Botany— see <http://laperouse.info/wordpress/wp-content/uploads/2013/04/SUBMISSION-TO-DRAFT-NSW-FREIGHT-AND-PORTS-STRATEGY.pdf>

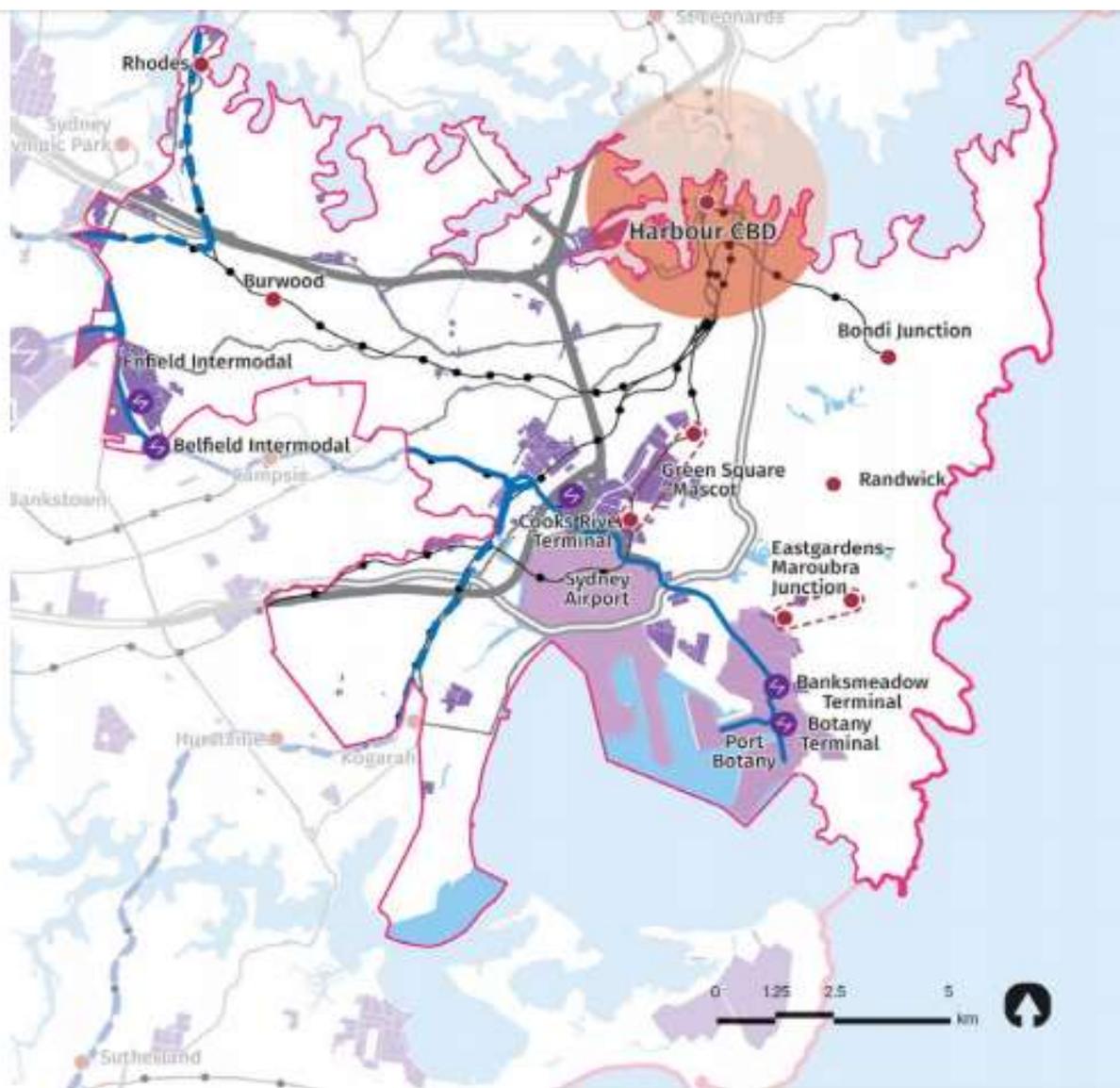
A GROWING SYDNEY



The F&PP has been released around the same time as the final GSC Eastern District Plan and at the beginning of a period when local communities, through their local councils, are being asked to review LEPs. Around Port Botany, intermodals such as Enfield and Moorebank and Cooks River and along rail and road freight corridors population densities are projected to increase in some pockets doubling within 5-10 years. Managers of supply chain infrastructure need to understand the context in which they

operate and recognise the obligations and responsibilities in being a ‘good neighbour’. The Department of Planning and Environment and the Greater Sydney Commission and local councils are driving a new era of consultation. Conversations with the community^{xxii} are critical as private living spaces are reduced and public spaces need to be shared even more because of this, and also because of the growing population. Recreational destinations close to the Sydney CBD are particularly in demand not only for the growing local populations, but also visitors from outside the area and overseas tourists.

The visitor economy is critical to Sydney’s prosperity.^{xxiii} Increasing pressure on popular destinations, such as the eastern beaches in Randwick and Waverley LGAs, has a flow on effect to areas which currently are less popular, for example destinations around the north of Botany Bay.



District Boundary	Industrial and Urban Services Land	Shared Rail
Metropolitan Centre	Trade Gateway	Motorway
Strategic Centre	Intermodal Terminal	Committed Motorway
Waterways	Freight Rail	

The map on page 92 GSC (above) shows proximity to high growth centres, CBD and high demand visitor destinations.

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Priorities and supporting statements in the F&PP focus on the protection of freight precincts, at the same time recognising sustainable goals.

On page 64 & 66 (F&PP):

3

Protect existing freight precincts and ensure sufficient future land use

Maintain and enhance access to existing freight precincts to improve the efficiency of the supply chain, protect corridors and land for freight activities, and take account of freight in future strategic planning activities.

4.3 Protect existing freight precincts and ensure sufficient future land use We will improve access to existing freight precincts, and protect the land necessary for future precincts to underpin the value of these facilities. The performance of port and intermodal terminals and surrounding precincts is strongly linked to the performance of the supporting freight transport network. Encroachment of urban development around key freight precincts such as Port Botany has seen an increase in congestion on already constrained freight corridors. This results in increased costs and declining productivity, acting as a restriction on business operations. Transport for NSW will:

- act to secure sufficient land for freight precincts, as well as identify and protect transport corridors to lower costs of development and maximise development potential*
- looks at strategies to address urban encroachment*
- plan for future growth in movement of goods across NSW, and within both Greater Sydney and regional areas, improving the efficiency of supply chains and overall freight productivity.*

(page 66 F&PP)

Page 64 & 69 (F&PP)

6

Ensure safe, efficient and sustainable freight access to places

Ensure an efficient, safe and effective freight network to meet the need of our three growing cities, balancing the expected growth of the freight task with the broader safety, environmental and amenity objectives for the transport network.

4.6 Ensure safe, efficient and sustainable freight access to places We will provide a safe, efficient and sustainable transport system connecting our three cities and key centres. The Movement and Place Framework uses five tiers to improve network performance, safety and place-making. These tiers are:

- motorways*
- movement corridors*
- vibrant streets*
- places for people*
- local streets*

The provision of effective tiered transport infrastructure and services within and between the three cities in Greater Sydney (Sydney, Parramatta and Western Sydney Airport) is essential to ensuring that freight movement is optimised, and residential amenity is protected. Transport for NSW will: Explore the implementation of initiatives to facilitate freight access to key urban centres including:

- efficient ways of moving freight through the five network tiers*
- managing freight movement through places with better land use integration and planning*
- maximising the potential of the latent capacity in the network throughout the 24 hour period*
- ensuring access to network information to assist efficient freight planning*
- promoting alternative last mile modes that are safe, sustainable and efficient*

within urban centres • investigate key arterial road and country rail branch lines to establish ways to better connect important regional centres

The direction for this Priority Action Area is to ensure an efficient, safe and effective freight network to meet the need of our three growing cities, balancing the expected growth of the freight task with the broader safety, environmental and amenity objectives for the transport network.

A simpler system that optimises the movement of people and goods, delivering safer and better journeys for customers. (page 69 F&PP)

We have the 'talk' but there is no evidence of how the 'walk' will be achieved and here I come back to the need for local engagement - building trust and collaboration.

The 3 Ports SEPP is a critically important planning instrument for protecting the Port Botany freight precinct both for supply chain operators and the people who live here yet within a short space of time since it came into effect^{xxiv} there have been significant breaches. Examples:^{xxv}

the Bunnings development on Denison Street;^{xxvi} Veolia Waste Transfer Station on Beauchamp;^{xxvii} Orica sub-division on Denison;^{xxviii} with the first of those listed resulting in 'unacceptable risk' and impacting decision-making on port development.^{xxix}

Local community and local councils raised objections and it is understood that Sydney Ports/NSW Ports^{xxx} did so, however, there was no united action. This is a major problem which is clearly not understood. A 'good neighbour' would understand that it is important to reach out to the local community and collaborate.

The Greater Sydney Commission (page 71 GSC) also emphasises the need to protect the Port Precinct and corridors.



Botany to WestConnex

31. Protect and grow the trade gateways by: Port Botany

- a. retaining industrial zoned land in and near Port Botany precinct*
- b. protecting Port Botany's function as an international gateway for freight and logistics and supporting port-related land uses and infrastructure in the area around the port*
- c. supporting the land use needs of freight movement to increase the proportion of container freight transported by rail*
- d. investigating a corridor for an enhanced road link from Port Botany to WestConnex*
- e. investigating duplication of Port Botany freight line*
- f. improving management of land use conflicts*
- g. **managing the biosecurity risk for primary industries***^{xxxii}
- h. **creating safe cycling and walking connections.***^{xxxiii}

(pictured above: Molineux Point Lookout, Port Botany)

I have highlighted g. managing the biosecurity risk for primary industries and h. creating safe cycling and walking connections because these, in particular, require a collaborative approach. The NSW Department of Primary Submission Draft Freight & Ports Plan, TfNSW -Lynda Newnam laperouse@bigpond.com 22/3/2018

Industries is expected to take the lead on community engagement and collaboration between agencies for biosecurity^{xxxiii}. The latter requires genuine cooperation from Transport for NSW, RMS, and NSW Ports. There are unnecessary barriers for cycling and walking around the port and industrial precinct which impact commuting and recreation. One example concerns the restrictions to what is and will increasingly be an important recreational area – Bumborah Point – Prince of Wales Drive – Molineux Point. The photograph below was taken on one of many mornings when the gates to the Drive and Molineux Point were shut and cyclists out for morning exercise were forced to turn around^{xxxiv}. The restrictions also affect walkers and fishers. As discussed previously, recreation space on North Botany Bay is at a premium and demand will increase as Sydney grows.



There have also been access issues with Penrhyn Estuary Bird Hide which is under the control of the Port Authority of NSW.^{xxxv} Foreshore Beach, is not the asset that was promised^{xxxvi} but highly eroded and with the poorest water quality in the State^{xxxvii}.

Noise and associated sleep disturbance is a major issue around the Port Botany Precinct. Residents who are vigilant at lodging complaints are sometimes treated as whingers and the rest who have tried and given up are ignored^{xxxviii}. When Sydney Ports managed Port Botany there was a 24/7 complaints line. This has been cut back to normal office hours, i.e. Monday to Friday, which means that disturbance experiences in the early hours of Saturday, Sunday and Monday are not dealt with until the office opens on Monday. This is another barrier to lodging incident reports.^{xxxix} Orora, the largest paper recycling plant in Australia, operates a 24/7 line. Orica operates a complaints line. It could be possible to explore sharing the expense of a 24/7 manned incident reporting service between the Port and Industrial neighbours.^{xl}

As I said in the introduction, *Social Licence* is important. Addressing community concerns does not have to degenerate into a ‘them and us’ approach. The GSC and the Department of Planning and Environment emphasise collaboration, co-design, co-creation, place-making and so on. TfNSW in both the Future Transport and Freight and Ports Plan talk about integration. A commitment to genuine engagement with ‘freight impacted’ communities and the adoption of a ‘good neighbour’ approach has the potential to generate benefits beyond ‘acceptance’. More ‘business as usual’ is likely to result in more of the following:



No break from noise

WE live in Banksmeadow and through the night you can hear constant beeping, banging and screeching of the containers being moved around, with the odd blast of the ships horn being thrown in on top. We also hear what sounds like a engine running all night which seems to come over from the ports. Often the noise from the container (what sounds as if it's being dropped from a great height) sets the dogs in the area off barking which then takes them ages to calm down. To cap all this off we get the single engine plane starting up and flying over around 4 am then we start again with the planes at 5am circling to land. Yeh we get a great nights sleep!

DENISE WOODRUFF,
Banksmeadow

Freight alarm bells

YOUR articles about the noise complaints made by residents of the Port Botany area and the fact the EPA admits it was wrong about noise level, has raised alarm bells for those of us fighting the Moorebank intermodal terminal.

Why is the Government proposing a new freight precinct in the middle of a residential area?

KATHY WILLIAMS, Wattle Grove

Living sleepily

RESIDENTS of Matraville, Chifley and Botany have a right to a quiet nights sleep. Yes, the port was there but it wasn't functioning 24 hours a day/seven days a week.

Residents require a decent nights uninterrupted sleep as I'm sure the next day there are cars to be driven, machinery to be operated, work to be performed- how effective can they be if they are constantly sleep deprived?

If the port was genuine in its attempts to mitigate the noise I'm sure they would have imposed a curfew on container movements between 11pm and 6am.

ANNA GALEA, Maroubra



Airport and Port Botany Expansions both predicated on major infrastructure spending eg. Westconnex ^{xli}

FINALLY

I am providing this submission on the understanding that it will be published on the Transport for NSW website along with all other submissions, excepting those where individuals and organisations have indicated a need for confidentiality. However, I would suggest that in the interests of 'robustness, transparency and accountability' that individuals and organisations be proactively encouraged to share their information, analyses and recommendations.

I have only had time to provide a brief response. Should you require clarification or further information please do not hesitate to contact me on 0409698321.

(Page 27 FS)



Figure 13 Empowering every customer

ⁱ page 1 [https://www.ntc.gov.au/Media/Reports/\(507CD955-8E47-1563-3C9B-748C8B8A46D7\).pdf](https://www.ntc.gov.au/Media/Reports/(507CD955-8E47-1563-3C9B-748C8B8A46D7).pdf) Supporting good decisions to improve transport productivity Project outcomes report August 2017

ⁱⁱ "Port Botany is the state's primary container port, and the largest bulk liquid and gas port in Australia. Annually it contributes \$3.2 billion to NSW's Gross State Product, and generates 21,000 jobs. Port Botany handles 98% of NSW's consumption of LPG, 90% of bulk chemical products, and 100% of the state's bitumen product. Container trade at Port Botany for the 2016-17 financial year grew by 4.6% compared to the previous financial year, at 2.43 million twenty-foot equivalent units (TEU's). Full container exports grew by 13% compared to the previous year, driven largely by cereals and grain, cotton and miscellaneous manufactured articles such as furniture and building materials. Road and rail access constraints at Port Botany must be addressed and capacity must be improved to meet future needs. The NSW Government recognises the importance of the dedicated rail freight line to Port Botany." (page 34 F&PP)

ⁱⁱⁱ Unregulated locomotives and ships have a significant impact - <https://www.epa.nsw.gov.au/your-environment/air/non-road-diesel-marine-emissions/reducing-diesel-emissions-locomotives> - but not discussed in this document.

^{iv} <https://portbotany.files.wordpress.com/2015/10/newnam-on-road-freight.pdf>

^v It is not responsible government policy to support cost shifting which in this case would be borne to some extent by the government in the Health and Education systems. There is extensive research on the impacts of sleep disturbance, as well as air quality (particularly associated with HV, locomotive and ship emissions) on health and brain development.

^{vi} Extensive research, summary here: <https://www.energetics.com.au/insights/thought-leadership/is-social-licence-to-operate-the-hard-science/>

^{vii} <https://future.transport.nsw.gov.au/wp-content/uploads/2017/plans/Future-Transport-Strategy-2056.pdf>

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- viii There is no breakdown of what constitutes this ‘freight’ – containerized goods, waste, domestic deliveries
- ix <https://www.nswports.com.au/assets/Uploads/Port-Botany-June-2017-Trade-Bulletin.pdf>
- x https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/NSW_Freight_and_Ports_Strategy-Full_Strategy-High_Resolution_0.pdf
- xi <https://portbotany.wordpress.com/water-quality-2/> - the ‘artist’s impression’ bears no resemblance to the state of the remaining beach
- xii At the Commission of Inquiry into the Port Expansion, the then CEO of stevedoring company Patrick presented material which indicated that the then footprint of the Port was sufficient to support annual trade of 6.5 million TEU. The constraint was not terminal space but the road and rail connections.
- xiii http://www.pc.gov.au/inquiries/completed/freight/submissions/new_south_wales_government_including_attachments_a_b_and_c/sub050attachment4.pdf
- xiv Transparency lacking with regard to the Port of Newcastle – further information <https://www.containerterminalpolicyinns.com.au/>
- xv 68 instances of ‘freight’ <https://gsc-public-1.s3-ap-southeast-2.amazonaws.com/s3fs-public/eastern-district-plan-0318.pdf> -
- xvi <https://www.nswports.com.au/assets/Uploads/Publications/NSW-Ports-Master-Plan-2015.pdf>
- xvii 26 overhead bridges Port Botany to Enfield - see page 74 https://bitre.gov.au/publications/2014/files/cr_001.pdf
- xviii <http://www.theland.com.au/story/5014522/parkes-gets-35m-rail-freight-terminal/>
- xix Port Kembla accessible to SW intermodals with MD completion.
- xx The cap at Port Botany was set at 3.2million in the 2005 Conditions of Consent. An EIS assessment was supposed to take place before any variation could be considered. Instead, the cap was taken off as part of the enabling legislation for the 99 lease of the Port, in November 2012.
- xxi Alternative approaches are possible. For example, witness the interest generated in waste with the “War on Waste’ series. <http://www.abc.net.au/ourfocus/waronwaste/>
- xxii Local residents, small and large businesses and beyond. Community engagement extends to education about freight eg. the current exhibition on Containerisation at the National Maritime Museum, however, major call-outs should always be to the immediate, those most likely to be negatively impacted.
- xxiii Data is available from Destination NSW
- xxiv <http://laperouse.info/wordpress/wp-content/uploads/2009/07/port-botany-new-sepp.pdf>
- xxv I quote 3 here but there are others within the SEPP and in surrounding buffer zones.
- xxvi <https://www.smh.com.au/national/nsw/tony-kelly-rezoned-botany-port-land-20140611-zs3sq.html>
- xxvii <https://portbotany.wordpress.com/2015/07/06/waste-transfer-facility-approved-at-banksmeadow/>
- xxviii <http://laperouse.info/wordpress/wp-content/uploads/2012/01/Statement-of-Environmental-Effects-16-20-Beauchamp-Road-Banksmeadow.pdf> The final outcome not aligned with statements in SEE.

^{xxxix} <https://portbotany.wordpress.com/2015/06/05/will-planning-minister-rob-stokes-ensure-proper-planning-for-port-botany/> eg Vopak expansion. The issue is not the area on the DP terminal but the hazardous goods routes in and out of the Port restricted because of the mix of land use to Foreshore/Botany and Beauchamp/Denison.

^{xxx} After May 2013 NSW Ports but before this Sydney Ports.

^{xxxi} <https://portbotany.files.wordpress.com/2017/11/spot-the-pest-surveillance-around-port-botany-small-file.pdf>

^{xxxii} <https://bikesbotanybay.files.wordpress.com/2014/09/mp-7-june-2014.jpg>

^{xxxiii} The Fire Ant incursion in 2014 <https://portbotany.wordpress.com/2014/12/06/fire-ant-alert-at-port-botany/> highlighted problems in communication and the need for greater cooperation between agencies as well as community outreach.

^{xxxiv} After experiencing this a few times walkers and cyclists are deterred from trying again. It appears to be a policy for alienating the neighbours from this space where reasonable access was supposed to be guaranteed as part of the lease agreement signed in early 2013. There was also a commitment for a platform for disabled fishers to be built, fully funded by Fisheries, at Molineux Point, however this was not progressed apparently because NSW Ports would not agree. <https://www.facebook.com/SaveMolineux/>

^{xxxv} It is also difficult for local residents to know who controls what around the Port Botany precinct as some of the assets are managed by the Port Authority of NSW and others by NSW Ports.

^{xxxvi} As small compensation for the loss of beach and access to Penrhyn Estuary as well as increased impacts associated with expansion.

^{xxxvii} <https://www.smh.com.au/environment/state-of-the-beaches-20162017-report-reveals-sydneys-cleanest-and-dirtiest-beaches-20171002-gysi5c.html>

^{xxxviii} It is a major concern raised at quarterly Port Botany Community Consultative Committee Meetings <https://portbotany.wordpress.com/community-consultation/port-botany-community-consultative-committee-minutes/>

^{xxxix} More appropriate language rather than ‘complaints’. There should be respect for neighbours providing information on operations.

^{xl} This is the largest concentration of hazardous industry in NSW with 9 Major Hazard Facilities. There is no holistic approach with regard to monitoring and basic engagement. The EPA has limited influence in bringing port and industry stakeholders together and in the case of the ‘noise strategy’ community were refused a place.

^{xli} The M4 East and M5 East ‘amplification’ and F6 are listed in the Port Botany Expansion EIS and Railing Port Botany Containers. Traffic studies published by TfNSW (eg the 2013 strategy) down play the share of freight and freight related traffic by not characterising by size and impact – a small sedan does not have anywhere near the impact of an HV moving 60 TEU for example. Photo below taken in Matraville Town Centre (closed town centre to DP World terminal) outside a school. Note the cabin is out of the picture.

