ARCADIS Design & Consultancy for natural and built assets

SIMTA Intermodal Terminal Facility- Stage 2

Preliminary Environmental Assessment and Request for Secretary's Environmental Assessment Requirements

SIMTA

SYDNEY INTERMODAL TERMINAL ALLIANCE

Part 4, Division 4.1, State Significant Development

April 2016

CONTACT

CLAIRE VAHTRA
Environmental Consultant

T 61 2 8907 9018
E Claire.vahtra@arcadis.com

Arcadis
5/141 Walker Street
North Sydney, NSW, 2060

SYDNEY INTERMODAL TERMINAL ALLIANCE (SIMTA)
SIMTA STAGE 2 PROPOSAL

Preliminary Environmental Assessment and request for Secretary's Environmental Assessment Requirements

Author	Claire Vahtra / Danielle Haynes / Ben Fethers	
Checker	Westley Owers	
Approver	Westley Owers	
Report No	03	
Date	28/04/2016	
Revision Text	Rev 03	

REVISIONS

Revision	Date	Description	Prepared by	Approved by
03	28/04/16	Final PEA for lodgement with DP&E	Claire Vahtra	Westley Owers

CONTENTS

FIGURES

TABLES

APPENDICES

GLOSSARY OF TERMS

Term	Description
AHIP	Aboriginal Heritage Impact Permit
The Boot Land	Residual Commonwealth owned land to the east of the SIMTA site between the site boundary and the Wattle Grove residential area which also forms part of the MIC Site
CBD	Central Business District
CPTED	Crime Prevention through Environmental Design
DA	Development Application
DJLU	Defence Joint Logistics Unit
DNSDC	Defence National Storage and Distribution Centre
DP	Deposited Plan
DP&E	NSW Department of Planning and Environment
EA	Environmental Assessment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPBC Act	*Commonwealth Environment Protection and Biodiversity Conservation Act 1999.*
GFA	Gross Floor Area
IMT	Intermodal Terminal
LGA	Local Government Area
Liverpool LEP	*Liverpool Local Environmental Plan 2008*
MIC	Moorebank Intermodal Company
MIC Proposal	The development of an intermodal facility, associated commercial infrastructure (warehousing) and a rail link (three options have been proposed) to be located on the MIC Site, for which an approval, under Part 4, Division 4.1 of the EP&A Act. The MIC Proposal is currently under assessment by the NSW Department of Planning and Environment.

Term	Description
MIC site	The former School of Military Engineering site to the immediate west of the SIMTA Site, across Moorebank Avenue.
MNES	Matters of National Environmental Significance
PAC	Planning Assessment Commission
PEA	Preliminary Environmental Assessment
Project site	Includes the SIMTA site and the Rail Corridor, i.e. the entire site area which was approved under the Concept Plan Approval.
The Proposal	Stage 2 of the Moorebank Intermodal Terminal Facility, including construction and operation of warehouse and distribution facilities. This PEA has been prepared to support an SSD application and request for Secretary's Environmental Assessment Requirements (SEARs) for the Proposal.
Proposal site	Includes the Stage 2 site as shown in Figure 2-3.
The Rail Corridor	Area defined as the 'Rail Corridor' within the Concept Plan Approval
SEARs	Secretary's Environmental Assessment Requirements
SIMTA	Sydney Intermodal Terminal Alliance
SIMTA Project	The SIMTA Moorebank Intermodal Facility at Moorebank, as approved by the concept plan (MP_10_0913).
The SIMTA Site	Includes the former DSNDC site, the land owned by SIMTA which is subject to the Concept Plan Approval.
SME	School of Military Engineering
SSD	State Significant Development
SSFL	Southern Sydney Freight Line
Stage 1 Proposal Site	The area of land within the Project site which forms the Stage 1 Proposal
Stage 1 site	Stage 1 of the Moorebank Intermodal Terminal Facility, including construction and operation of the Moorebank Intermodal Terminal and rail link. The Stage 1 Proposal is currently under review and assessment by the NSW Department of Planning and Environment.
State and Regional Development SEPP	*State Environmental Planning Policy (State and Regional Development) 2011*

Term	Description
TEU	Twenty-foot equivalent unit or a standard shipping container
WSUD	Water Sensitive Urban Design
WWII	World War II

EXECUTIVE SUMMARY

Background

The Sydney Intermodal Terminal Alliance (SIMTA) is a consortium of Qube Holdings and Aurizon Holdings, and proposes to redevelop 83 hectares of industrial zoned land for use as an intermodal terminal facility at Moorebank, NSW (the SIMTA Project).

The SIMTA Project involves the development of an intermodal facility, including warehouse and distribution facilities, a freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the eastern side of Moorebank Avenue, Moorebank (the SIMTA Site), together with a rail link to the Southern Sydney Freight Line (SSFL) within an identified rail corridor (the Rail Corridor) (the entire area, being the SIMTA site and Rail Corridor, is referred to as the Project site).

Concept Plan Approval (MP 10_0193) was granted for the SIMTA Project on 29 September 2014 by the NSW Department of Planning and Environment (DP&E) and Commonwealth Approval (No. 2011/6229) was granted under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) by the Commonwealth Minister for the Environment on 6 March 2014.

The SIMTA Project is to be developed in three key stages:

- Stage 1- Construction and operation of the Intermodal Terminal Facility and rail link
- Stage 2- Construction and operation of warehouse and distribution facilities
- Stage 3- Extension of the Intermodal Terminal Facility and completion of warehouse and distribution facilities.

This Preliminary Environmental Assessment (PEA) has been prepared to support a State Significant Development (SSD) application under Part 4, Division 4.1 of the *Environmental Planning and Assessment Act 1979* (NSW) (EP&A Act) for the second stage of the SIMTA Project (the Proposal).

The Proposal

Approval is being sought for the construction and operation of warehouses and distribution facilities on the SIMTA Site at Moorebank (the SIMTA Site). The Proposal would be located on land within and surrounding the SIMTA SiteThe key components of the Proposal include:

- Warehousing comprising 300,000m^2 GFA and additional ancillary offices
- Establishment of internal site roads, and connection of the Proposal to the surrounding road network
- Freight village
- Ancillary supporting infrastructure, including:
  - Stormwater, drainage and flooding infrastructure
  - Utilities relocation and installation
  - Vegetation clearing, remediation, earthworks, signage and landscaping
- Possible subdivision of the SIMTA site.
- Activation of existing warehouses.

The Proposal would interact with the Stage 1 Proposal (SSD_6766) via the transfer of containers between the intermodal terminal (IMT) (subject of the Stage 1 Proposal) and warehousing and distribution facilities and ancillary infrastructure (subject of this Proposal).

To facilitate operation of the Proposal, the following construction activities would be carried out across and surrounding the Proposal site (area on which the Proposal is to be developed):

- Vegetation clearance
- Remediation works
- Demolition of existing buildings and infrastructure on the Proposal site
- Earthworks and levelling of the proposal site
- Drainage and utilities installation
- Establishment of a site vehicle entrance(s) from Moorebank Avenue
- Establishment of hardstand across the Proposal site
- Construction of warehouses and distribution facilities, ancillary offices and the ancillary freight village
- Construction works associated with signage, landscaping, stormwater and drainage works.

All works carried out for the purpose of the Proposal would be in accordance with the Concept Plan Approval Conditions of Approval and Statement of Commitments prescribed as part of the Concept Plan Approval for the SIMTA Project.

Purpose of this report

The purpose of this PEA is to assist the formulation of environmental assessment requirements by the Secretary of the Department of Planning and Environment (SEARs) for the Proposal under Clause 3 of schedule 2 of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). This PEA:

- Describes the Proposal
- Considers the potential environmental issues for the Proposal
- Identifies key environmental issues for the Proposal
- Identifies the relevant Concept Plan Approval Conditions of Approval and Statement of Commitments relevant to the Proposal.

This PEA and the SEARs would inform the preparation of an Environmental Impact Statement (EIS) for the Proposal. The form and content of the EIS would be in accordance with clauses 6 and 7 of the EP&A Regulation.

Schedule 3 of the Concept Plan Approval included a number of comprehensive environmental assessment requirements which must be considered for all Development Applications (DAs) submitted under the SIMTA Concept Plan Approval. SIMTA requests that the SEARs to be prepared for the Proposal include only those relevant environmental assessment requirements identified in the Concept Plan Approval Conditions of Approval, and do not provide additional environmental assessment requirements for the EIS to consider. It is expected that the SEARs to be provided would replicate those included in Schedule 3 of the Concept Plan Approval Conditions of Approval.

Need and justification for the Proposal

Continued growth in container throughput at Port Botany is expected to continue, as evidenced by the removal of the container throughput cap in 2012. In order to support future growth, more freight needs to be moved to and from Port Botany via rail. If the current rail mode share is not improved, heavy vehicle traffic at Port Botany is expected to increase by up to four times its current level by 2030.

The SIMTA Project is considered the most viable solution to increase the rail mode share by 2030. The Moorebank Precinct has been identified in both Federal and State strategies as the best location for an IMT facility to service the industrial areas of south-western Sydney that is located in a suitable position near the main arterial road network and a dedicated freight line to Port Botany.

The Proposal, as part of the SIMTA Project aligns with the objectives and goals of a number of national and state strategic planning guidelines and policies.

Proposal objectives

The NSW Government and the Port Authority of NSW have a shared objective of increasing freight movement by rail and improving the efficiency of port-related freight movements across the infrastructure network.

The objectives for the Proposal as part of the SIMTA Project, are to deliver an IMT facility which:

- Is strategically located to utilise existing and future metropolitan, State and National rail freight and road networks, including the SSFL and the M5 and M7 Motorways
- Will provide capacity for an annual throughput of up to 500,000 twenty foot equivalent units (TEUs or a standard shipping container), as an initial step to meeting the forecast demand of approximately 1,000,000 TEU for Western and South Western Sydney
- Make a significant contribution to achieving Federal and State land use, freight and logistics policies, including the State Plan target of increasing container freight being transported by rail
- Will assist with alleviating freight-related road congestion between Port Botany and Moorebank, particularly along the M5 Motorway
- Is appropriately designed and managed to provide operational efficiencies and to appropriately mitigate impacts on the surrounding environment and local community
- Provides distribution opportunities in a strategically appropriate location, in turn providing employment opportunities and associated economic and social benefits.

The Proposal would assist in the delivery of the above objectives as it would provide warehousing and distribution services within the SIMTA site in proximity to the IMT, which in turn would also provide:

- Support for an increased rail-share of container freight movements
- Operational and cost efficiencies for the handling, storage and distribution of freight
- Reduced impacts on the surrounding environment, sensitive receivers and local areas, given efficiencies in supply chain movements.

Planning approval pathway

The Concept Plan Approval (MP 10_0193) states that approval to carry out the SIMTA Project is subject to Part 4, Division 4.1 of the EP&A Act and any environmental assessment would be carried out in accordance with the future environmental assessment requirements, specified in Schedule 3 of the Concept Plan Approval Conditions of Approval.

Further, the Proposal would exceed the $50 million AUD threshold for warehouse and distribution facilities prescribed in clause 12(1) of Schedule 1 of the *State Environment Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP), and would be for the purpose of warehouses or distribution centres, the proposal is declared to be SSD under the State and Regional Development SEPP.

The SIMTA Project is located on land zoned as IN1 General Industrial under the *Liverpool Local Environmental Plan 2008* (Liverpool LEP). The project is classified as a freight distribution facility and warehouse or distribution centre, both of which are permitted with consent.

Potential environmental issues

A preliminary review of the potential environmental issues associated with the Proposal has been carried out, which has indicated that the following are considered key issues:

- Traffic and transport
- Noise and vibration
- Air quality
- Biodiversity
- Stormwater and flooding
- Soil and contamination
- Aboriginal heritage
- Non-indigenous heritage
- Visual amenity, urban design and landscaping
- Hazards and risks.

The design, EIS and associated technical specialists for the Proposal will include a detailed environmental assessment of the relevant key issues and other issues, identified in the Concept Plan Approval Conditions of Approval and Statement of Commitments.

A number of other environmental issues have also been identified. These issues are outlined in this report and are considered to be of lesser consequence, taking into consideration the Proposal scope, existing environment and implementation of standard mitigation measures.

This PEA and the EIS to be prepared for this Proposal will consider the Concept Plan Approval Conditions of Approval and Statement of Commitments provided as part of the Concept Plan Approval, as well as the EPBC Approval (No. 2011/6229, granted in March 2014), where relevant.

1 INTRODUCTION

1.1 Background

1.1.1 SIMTA Project

SIMTA is a consortium of Qube Holdings and Aurizon Holdings, and proposes to redevelop 83 hectares of industrial zoned land for use as an intermodal terminal facility at Moorebank, NSW (the SIMTA Project).

The SIMTA Project involves the development of an intermodal facility, including warehouse and distribution facilities with ancillary offices, a freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works on the SIMTA Site on the eastern side of Moorebank Avenue, Moorebank, together with a rail link to the SSFL within the Rail Corridor (the entire area, being the SIMTA site and Rail Corridor is herein referred to as the Project site). The SIMTA Project is to be developed in three key stages:

- Stage 1- Construction and operation of the Intermodal Terminal Facility and rail link (refer to SIMTA Stage 1 discussion at Section 1.1.2)
- Stage 2- Construction and operation of warehouse and distribution facilities (refer to Section 1.1.3)
- Stage 3- Extension of the Intermodal Terminal Facility and completion of warehouse and distribution facilities.

The overall capital investment value for the SIMTA Project is $490 million.

A summary of the existing approvals[1] issued to date relating to the SIMTA Project, include:

- **EPBC Approval** (No. 2011/6229) - granted by the Commonwealth Minister for the Environment under the EPBC Act to SIMTA on 6 March 2014 for the carrying out of the SIMTA Project. The SIMTA Project was declared a controlled action due to its potential impacts on listed threatened species and communities (sections 18 and 18A of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act)) and Commonwealth land (sections 26 and 27A of the EPBC Act)
- **Concept Plan Approval** (MP 10_0193) - granted by the NSW Planning Assessment Commission (PAC) as delegate of the Minister for Planning to SIMTA on 29 September 2014 under Transitional Part 3A provisions of the EP&A Act.

Both of these approvals involved the preparation of design and environmental assessment documentation. Further detail relating to the previous investigation and studies undertaken as part of the EPBC Approval and Concept Plan Approval process is provided in Section 7 of this PEA.

The Conditions of Approval for both the EPBC Approval and the Concept Plan Approval provide a detailed list of further investigations that should be undertaken prior commencement of any Action and information provided to inform future assessment of planning applications for the SIMTA Project to authorise the construction and operation of the SIMTA Project. The Conditions of Approval relating to both the EPBC Approval and Concept Plan Approval are included at Appendix A.

The various land uses approved as part of the Concept Plan Approval (being the IMT, rail corridor, warehouse and distribution facilities and ancillary terminal facilities) are reproduced in Figure 1-1.

[1] SIMTA Stage 1 (SSD_6766) and a modification to the Concept Plan (MP 10_0193) are currently under assessment by DP&E. Refer to Section 1.1.2of this PEA for further information.

Figure 1-1 Concept Plan (approved in the Concept Plan Application, MP 10_0193

1.1.2 SIMTA Stage 1 Proposal / Concept Plan Modification

In addition to the Concept Plan and EPBC approvals, the SIMTA Stage 1 Proposal (SSD_6766), the first DA under the Concept Plan for the SIMTA Project, is currently within the final stages of assessment under Part 4, Division 4.1 of the EP&A Act. The Stage 1 Proposal seeks approval for the construction and operation of an IMT, including the necessary infrastructure to support a container freight road volume of 250,000 TEU throughput per annum. Specifically, the Stage 1 Proposal includes the following key components, which together comprise the IMT facility:

- Truck processing, holding and loading areas with an entrance and exit point from Moorebank Avenue
- Rail loading and container storage areas including the installation of four rail sidings with an adjacent container storage area serviced initially by manual handling equipment and progressive installation of overhead gantry cranes
- An administration facility and associated car parking with light vehicle access from Moorebank Avenue
- The Rail link, located within the Rail Corridor and including a connection to the IMT facility, traversing Moorebank Avenue, Anzac Creek and Georges River and connecting to the SSFL
- Ancillary works including vegetation clearance, remediation, earth works, utilities installation/connection, signage and landscaping.

A modification to the SIMTA Concept Plan Approval (MP 10_0193) under Section 75W (Transitional Part 3A) of the EP&A Act was submitted to DP&E concurrently with an EIS for the SIMTA Stage 1 Proposal. Both the Concept Plan modification and Stage 1 Proposal EIS are in the final stages of assessment by DP&E. The modification proposed an amendment to the Concept Plan Approval Conditions of Approval, including updating the Project site[2] and removing a condition relating to the preparation of a Voluntary Planning Agreement(s). This modification, would on approval, update the Concept Plan Approval Conditions of Approval relevant to DAs prepared for future stages of the SIMTA Project.

1.1.3 SIMTA Stage 2 Proposal (subject of this SSD Application)

The SIMTA Stage 2 Proposal (the Proposal), which is the subject of this PEA and represents the second stage of the SIMTA Project, seeks approval under Part 4, Division 4.1 of the EP&A Act. The SIMTA Stage 2 Proposal seeks approval for the construction and operation of warehousing, distribution facilities and associated infrastructure.

The key components of the Proposal include:

- Warehousing comprising 300,000m^2 GFA and additional ancillary offices
- Establishment of internal site roads, and connection of the Proposal to the surrounding road network
- Freight village
- Ancillary supporting infrastructure, including:
  - Stormwater, drainage and flooding infrastructure
  - Utilities relocation and installation
  - Vegetation clearing, remediation, earthworks, signage and landscaping
- Possible subdivision of the SIMTA site
- Activation of existing warehouses.

The construction and operation of the Proposal will be consistent with the provisions prescribed in the Concept Plan Approval Conditions of Approval and Statement of Commitments, where relevant (refer to Appendix A).

[2] The Project site include the SIMTA site and also the Rail Corridor as identified with the Concept Plan Approval documentation.

1.1.4 Proposal components and key terms

Table 1-1 provides a summary of key components of the SIMTA Project and surrounding developments relevant to the Proposal which are described and referenced throughout this PEA..

Table 1-1 Key terms within this PEA

Term	Description
Concept Plan Approval	Concept Plan Approval (MP 10_0193) granted on 29 September 2014 for the development of the SIMTA Moorebank Intermodal Facility at Moorebank. This reference includes the associated Conditions of Approval and Statement of Commitments.
EPBC Approval	Approval (No. 2011/6229), granted under the EPBC Act on March 2014 by the Commonwealth Minister for the Environment for the development of the SIMTA Moorebank Intermodal Facility at Moorebank.
SIMTA Project	The SIMTA Moorebank Intermodal Facility at Moorebank, as approved by the concept plan (MP_10_0913).
SIMTA site	Includes the former DSNDC site, the land owned by SIMTA which is subject to the Concept Plan Approval.
Rail Corridor	Area defined as the 'Rail Corridor' within the Concept Plan Approval.
Project site	Includes the SIMTA site and the Rail Corridor, i.e. the entire site area which was approved under the Concept Plan Approval.
Stage 1 Proposal	Stage 1 of the Moorebank Intermodal Terminal Facility, including construction and operation of the Moorebank Intermodal Terminal and rail link. The Stage 1 Proposal is currently under review and assessment by the NSW Department of Planning and Environment.
Stage 1 Proposal Site	The area of land within the Project site which forms the Stage 1 Proposal.
The Proposal	Stage 2 of the Moorebank Intermodal Terminal Facility, including construction and operation of warehouse and distribution facilities. This PEA has been prepared to support an SSD application and request for Secretary's Environmental Assessment Requirements (SEARs) for the Proposal.
Proposal site	Includes the Stage 2 site as shown in Figure 2-3.
MIC Proposal	The development of an intermodal facility, associated commercial infrastructure (warehousing) and a rail link (three options have been proposed) to be located on the MIC Site, for which an approval, under Part 4, Division 4.1 of the EP&A Act. The MIC Proposal is currently under assessment by the NSW Department of Planning and Environment.
MIC site	The former School of Military Engineering site to the immediate west of the SIMTA Site, across Moorebank Avenue.

1.2 Purpose of this report

This PEA has been prepared to assist the formulation and issue of environmental assessment requirements by the Secretary of the Department of Planning and Environment (the Secretary's Environmental Assessment Requirements (SEARs)) under clause 3 of Schedule 2 of the EP&A Regulation.

To support the request for SEARs, this PEA:

- Describes the SIMTA Stage 2 Proposal
- Considers the potential environmental issues associated with the Proposal
- Identifies key environmental issues for the Proposal which will be considered in the EIS to be prepared
- Outlines further environmental assessments proposed to be undertaken to inform and support the EIS for the Proposal.

Approval for the Proposal is sought under Part 4, Division 4.1 of the EP&A Act. Given that future assessment requirements have already been issued by the PAC in relation to the SIMTA Project and form part of the Concept Plan Approval Conditions of Approval, it is anticipated that the SEARs for the Proposal will replicate, where relevant, and be consistent with, those future assessment requirements only. Accordingly, it is envisaged that the SEARs would reflect these requirements only and the EIS for the Proposal would not require or include any further environmental assessment above or in addition to those identified in the Concept Plan Approval.

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

Additional discussions relating to further environmental studies and investigations to be undertaken to inform and support the EIS for the Proposal is provided in Section 7 and 8 of this PEA.

1.3 Status as a Transitional Part 3A Project

The SIMTA Project is a Transitional Part 3A Project pursuant to Schedule 6A of the EP&A Act, given that it is the subject of a Concept Plan Approval.

Of particular importance and relevance, is that in determining the Concept Plan Approval, the PAC determined:

a) *To approve the Concept Plan referred to in Schedule 1, subject to the terms of approval in Schedule 2 and the future assessment requirements in Schedule 3, pursuant to s75O of the EP&A Act;*

b) *Under s75P(1)(b) of the EP&A Act that approval to carry out the development the subject of the Concept Plan is to be subject to Part 4 Division 4.1 of the EP&A Act; and*

c) *Under s75P(2)(c) of the EP&A Act future development is subject to Part 4 Division 4.1 of the EP&A Act, and that development is subject to the future assessment requirements specified in Schedule 3 of the Concept Plan Approval*.

Schedule 3 of the Concept Plan Approval states that specified environmental assessment requirements apply to future DAs under the SIMTA Concept Plan that are subject to Part 4 Division 4.1 of the EP&A Act. This future assessment of key issues, relates to the '*extent required by the particular application and to the land subject of the relevant stage*', i.e. the type of works included in the DA and the likely direct and indirect impacts on the site and surrounding land.

Schedule 3 of the Concept Plan Approval specifies the following further assessment requirements:

- Air Quality
- Best Practice Review (relates to air, noise and, to a lesser extent, traffic impacts and the implementation of 'best practice' process design, emissions control and management measures)
- Traffic and Transport
- Rail

- Noise and Vibration
- Soil and Water (requires assessment not only for the Stage 1 footprint but for the footprint of the Project Site, including the rail link)
- Heritage (Aboriginal and Historic Heritage)
- Visual Amenity, Urban Design and Landscaping
- Biodiversity
- Section 94 Contributions (i.e. impacts on local infrastructure and relevant s94 Contributions)
- Waste
- Hazards and Risks
- Freight Village (description of the freight village operation)
- Bushfire Management
- Environmental Risk Analysis.

It should be acknowledged that the Concept Plan Approval Conditions of Approval and Statement of Commitments are not all relevant to the Proposal. An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, as well as a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been carried out to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

1.4 Planning Approval pathway overview

The Concept Plan for the SIMTA Project was granted approval on September 29 2014. The Concept Plan Approval, under Part 3A, Section 75O of the EP&A Act is for "*use of the site* [Project site] *as an intermodal facility, including a rail link to the Southern Sydney Freight Line within an identified rail corridor, warehouse and distribution facilities, freight village (ancillary site and operational services), stormwater, landscaping, servicing and associated works*".

The Concept Plan Approval Conditions of Approval require the construction or operation of any part of the SIMTA Project to be subject to separate development consent under the EP&A Act. The Concept Plan Approval states that approval to carry out the SIMTA Project is subject to Part 4, Division 4.1 of the EP&A Act and any environmental assessment would be carried out in accordance with the future environmental assessment requirements, specified in Part 2 of Schedule 3 of the Concept Plan Approval Conditions of Approval.

In addition, Section 8(1) of the State and Regional Development SEPP states that

'*Development is declared to be State significant development for the purposes of the Act if:*

(a) The development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and
(b) *The development is specified in Schedule 1 or 2*.'

The SIMTA Project is located on land zoned as IN1 General Industrial under the *Liverpool Local Environmental Plan 2008* (Liverpool LEP). The project is classified as a freight distribution facility and warehouse or distribution centre, both of which are permitted with consent.

However, clause 12(1) of Schedule 1 of the State and Regional Development SEPP states that development for the purposes of warehouses or distribution centres is considered to be State significant if '*Development has a capital investment value of more than $50 million for the purpose of warehouse or distribution centres (including container storage facilities) at one location and related to the same operation*'.

As the capital investment value of the Proposal is estimated to be around $356 million AUD (excluding GST), the Proposal would exceed the $50 million AUD threshold prescribed in clause 12(1) of Schedule 1 of the State and Regional Development SEPP, and would be for the purpose of warehouses or distribution centres, the Proposal is declared to be SSD under the State and Regional Development SEPP.

As a result, the Proposal would require a DA to be submitted to DP&E, accompanied by an EIS under Part 4, Division 4.1 of the EP&A Act. Further, clause 3 of Schedule 2 of the EP&A Regulation states that '*Before*

preparing an environmental impact statement, the responsible person must make a written application to the Secretary for the environmental assessment requirements with respect to the proposed statement.'

In accordance with the Concept Plan Approval, development consent is sought for the Proposal under Part 4, Division 4.1 of the EP&A Act. This PEA has been prepared to commence the SSD Application and approval process for the Proposal and to satisfy Clause 3, Schedule 2 of the EP&A Regulation, with the request of SEARs for the Proposal.

1.5 Applicant for the Proposal and Capital Investment Value

The Applicant for the Proposal is SIMTA, a consortium comprising Qube Holdings and Aurizon Holdings. The Applicant has national experience in logistics delivery, property management and a strong commitment to stakeholder engagement.

SIMTA was the proponent for the Concept Plan Approval, EPBC Approval and Stage 1 Proposal (currently under assessment by DP&E). In addition, the Applicant is well placed to deliver the Proposal as they currently own and/or operate eight IMTs nationally.

The capital investment for the SIMTA Project, consistent with the definition provided in Clause 3 of the EP&A Regulation is $490 million Australian Dollars (AUD). An estimate of the Capital Investment Value of the Proposal, for the purposes of this PEA is approximately $356 million AUD (excluding GST). A Quantity Surveyors Report, which provides an estimated Capital Investment Value for the Proposal has been prepared and is provided at Appendix B of this PEA.

1.6 Relationship to the MIC Project

On 4 June 2015 the Moorebank Intermodal Company (MIC), with the approval of the Commonwealth Government, entered into an agreement with SIMTA.

The SIMTA Project and the MIC Project remain as independent DAs. The subsequent stages of these approvals/applications are subject to their respective Conditions of Approval within MP10_0193 and SSD 5066 (pending determination), respectively. Notwithstanding this, there is potential for an interrelationship between the two Projects.

1.7 Structure of this document

The remainder of this PEA has been structured as follows:

- **Section 2** provides a summary of the site context, with a particular focus on the characteristics of surrounding land uses
- **Section 3** includes a summary of the proposed need and justification for the Proposal
- **Section 4** provides a description of the Proposal, i.e. the development (construction and operation) for which consent is sought under Part 4, Division 4.1 of the EP&A Act
- **Section 5** provides a summary of the relevant legislation and approvals which apply to the development of the Proposal and will be considered further within the EIS
- **Section 6** summarises consultation (both government, private stakeholders and the community) which has been undertaken for the Concept Plan Approval and SIMTA Stage 1 Proposal and also details further consultation which is to be undertaken for the Proposal
- **Section 7** describes the key potential issues associated with the construction and operation of the Proposal. This section also details the results of previous investigations that have been undertaken as part of the Concept Plan Approval and SIMTA Stage 1 Proposal (as relevant) environmental assessments and lists further environmental assessment which will be undertaken for the Proposal in accordance with the Concept Plan Approval Conditions of Approval and Statement of Commitments.

2 SITE CONTEXT

2.1 Regional Context

The Proposal site is situated within the Liverpool Local Government Area (LGA) in Sydney's South West Sub-Region, approximately 2.5 kilometres from the Liverpool City Centre. The Proposal site is about 27 kilometres south-west of the Sydney Central Business District (CBD) and approximately 26 kilometres west of Port Botany. The regional context of the Proposal is shown in Figure 2-1.

The Proposal site is about 800 metres south of the intersection of Moorebank Avenue and the M5 South West Motorway (the M5 South West). The M5 South West provides the main road link between the Proposal site, key employment and industrial areas within Sydney's West and South-Western Sub-Regions, the Sydney orbital network and the National Road Network.

The catchment area for the Proposal can be broadly defined as Sydney's Industrial West, Liverpool and South West, an area bordered by the M4 Motorway and Great Northern Highway in the north; the Hume Highway in the east; and the Northern Road in the west.

2.2 Local Context

The Proposal site is located about 17 kilometres south of the Parramatta CBD, five kilometres east of the M5/M7 Motorway Interchange, 1.3 kilometres from the main north-south rail line and SSFL, and 0.6 kilometres from the M5 South West.

The Project site was previously operating as the Department of Defence's National Storage and Distribution Centre (DNSDC); however, the Department of Defence has now vacated the site and relocated to the Defence Joint Logistics Unit (DJLU) (to the immediate north of the SIMTA site).

The majority of other areas of land surrounding the SIMTA site are also owned by the Commonwealth, including:

- The Moorebank Intermodal Terminal site (MIC site), formerly the School of Military Engineering (SME), on the western side of Moorebank Avenue directly adjacent to the SIMTA site
- The Holsworthy Military Reserve, to the south of the SIMTA site on the southern side of the Sydney Trains East Hills Rail Corridor
- Residual Commonwealth Land (known as the Boot Land), to the east of the SIMTA site between the site boundary and the Wattle Grove residential area which also forms part of the MIC Site.

The MIC site is the subject of a DA (SSD_5066), under Part 4, Division 4.1 of the EP&A Act, for the development of an intermodal facility known as the Moorebank Intermodal Terminal Project (MIC Project). The MIC Project, is in the final stages of assessment by DP&E, however has not been determined. .

Glenfield Waste Services, south-west of the Proposal is proposing to develop a Materials Recycling Facility on land owned by the Glenfield Waste Services Group within the boundary of the current landfill site at Glenfield. The facility is proposed to recycle a maximum of 450,000 tonnes of material per year. The Glenfield Waste Services Proposal is subject of a DA (SSD_6249) under Part 4, Division 4.1 of the EP&A Act. The EIS for the Proposal was placed on exhibition between 17 February 2016 and 18 March 2016 and the Proponent is currently reviewing submissions received during public exhibition.

The area immediately south of the SIMTA site, known as the 'Southern Boot Land' includes an existing rail spur within heavily vegetated remnant bushland. The Rail Corridor to the south of the proposal and forming part of SIMTA Stage 1 Proposal includes a range of vegetation, varying from remnant bushland to the north-east of the Sydney Trains East Hills Rail Line, riparian vegetation along the banks of the Georges River, and highly disturbed land currently used for the operation of the Glenfield Quarry and Glenfield Waste Facility. Rail infrastructure is also located further west of the SIMTA site, including the Main South passenger rail line and the SSFL.

A number of residential suburbs are located near the Proposal site[3] (the area of land within the SIMTA site which is the subject of the Proposal), including:

- Wattle Grove – approximately 640 metres east of the Proposal site.
- Moorebank - approximately 870 metres north-east of the Proposal site.
- Casula - approximately 1.3 kilometres west of the Proposal site.
- Glenfield – approximately two kilometres south-west of the Proposal site.

The Proposal site is also located near a number of significant industrial precincts, including Moorebank (including but not limited to the Yulong and Amiens and ABB sites) and Warwick Farm to the north, Chipping Norton to the north-east, Prestons to the west and Glenfield and Ingleburn to the south-west.

The Moorebank Industrial Area is the closest industrial precinct to the Proposal, comprising around 200 hectares of industrial development, the majority of which is located to the north of the M5 South West between Newbridge Road, the Georges River and Anzac Creek. The Moorebank Industrial Area supports a range of industrial and commercial uses, including freight and logistics, heavy and light manufacturing, offices and business park developments.**Error! Reference source not found.**.

[3] The distance of these residential suburbs has been calculated from the closest boundary of the Stage 1 Proposal Site to the suburb.

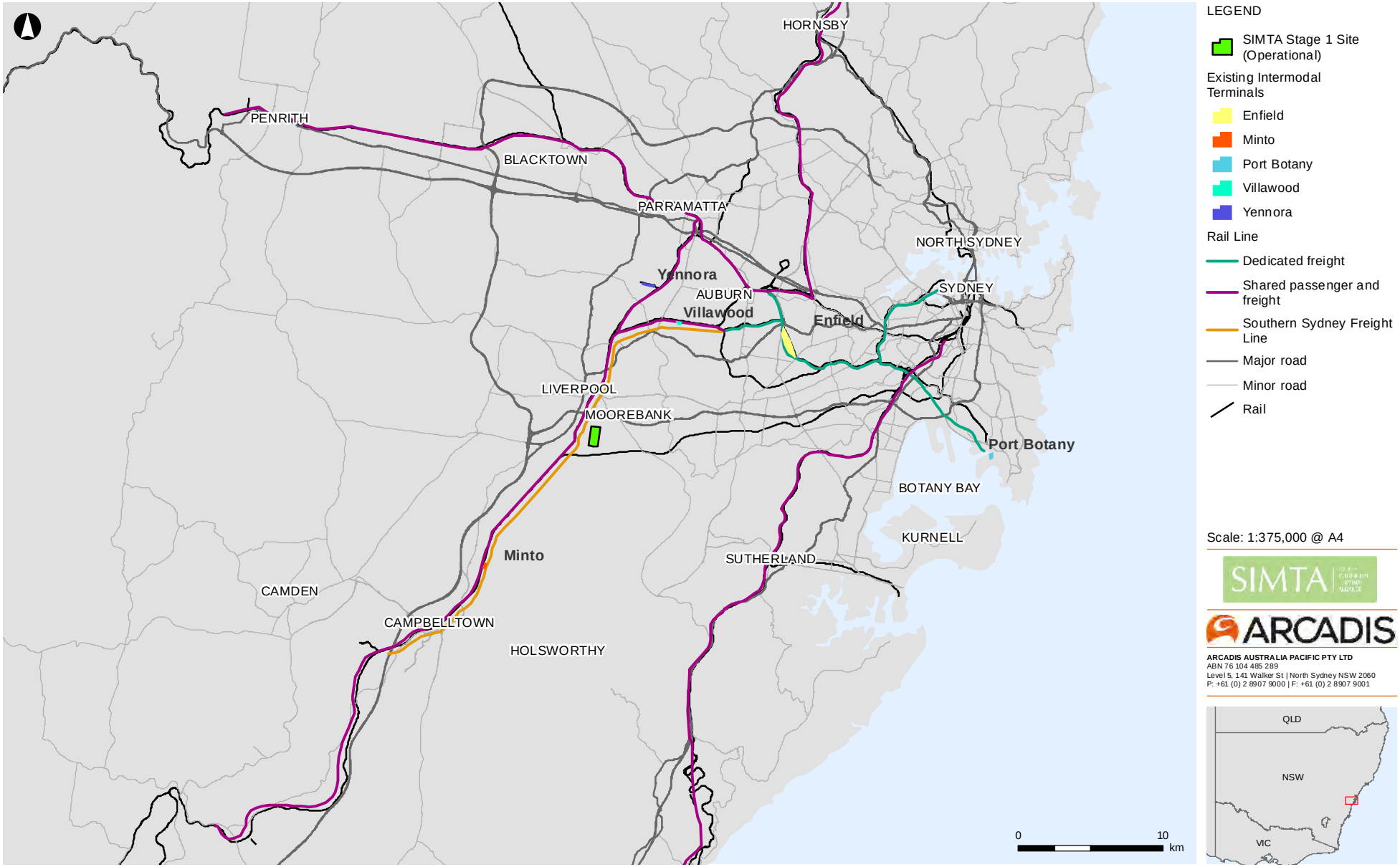
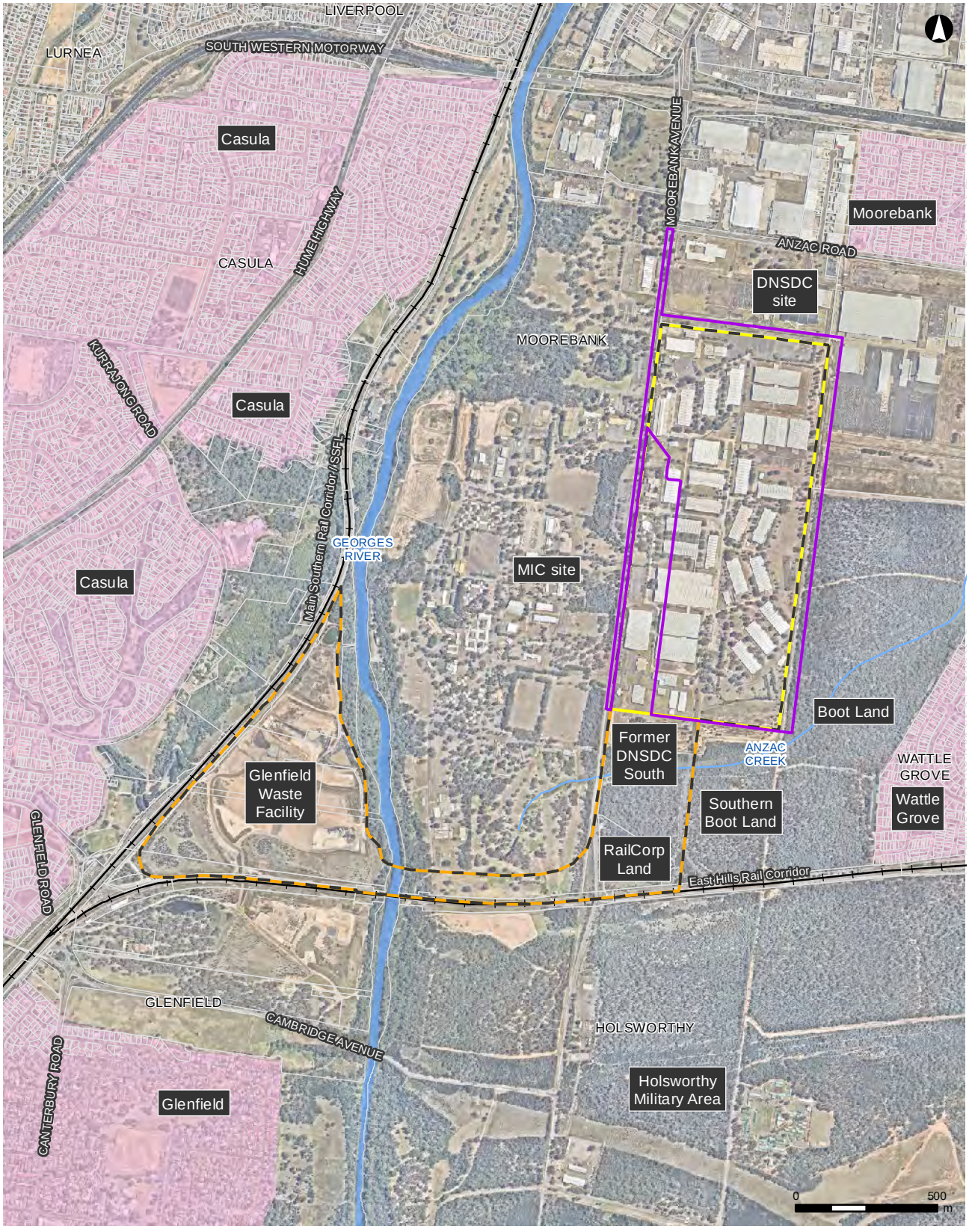


Figure 2-1: Regional context of the Proposal



LEGEND

- SIMTA project site
- Rail Corridor
- SIMTA site
- SIMTA Stage 2 Site
- Lot boundary
- Watercourse
- Existing railway
- Residential area

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 5, 141 Walker St | North Sydney NSW 2060
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Scale: 1:20,000 @ A4

Figure 2-2: Local context of the Proposal

Date: 26/04/2016 Path: \\hc-aus-ns-fs-01\jobs\AA008765\L-GIS\A_Current\B_Maps\PEA\AA008765_PEA_Fig2-2_LocalContext_r1v2.mxd
Created by : GC
QA by : CV

2.3 Description of the Proposal site

The Proposal site comprises around 67 hectares of land within the Project site (refer to Figure 2-3) and is located mostly within Lot 1 in Deposited Plan (DP) 1048263. The Proposal site is generally flat with direct frontage and access to Moorebank Avenue, a privately owned road that is currently accessible to the public.

The Proposal site has historically been associated with the Department of Defence, being used in the early 1900s as a training camp and since 1944, a military storage facility. The entire SIMTA Project site was sold by the Commonwealth in 2002, and until recently, was leased by the Department of Defence for use as the DSNDC site.

As discussed in Section 2.2, the Department of Defence has vacated the Proposal site; however, the following infrastructure and feature are still present:

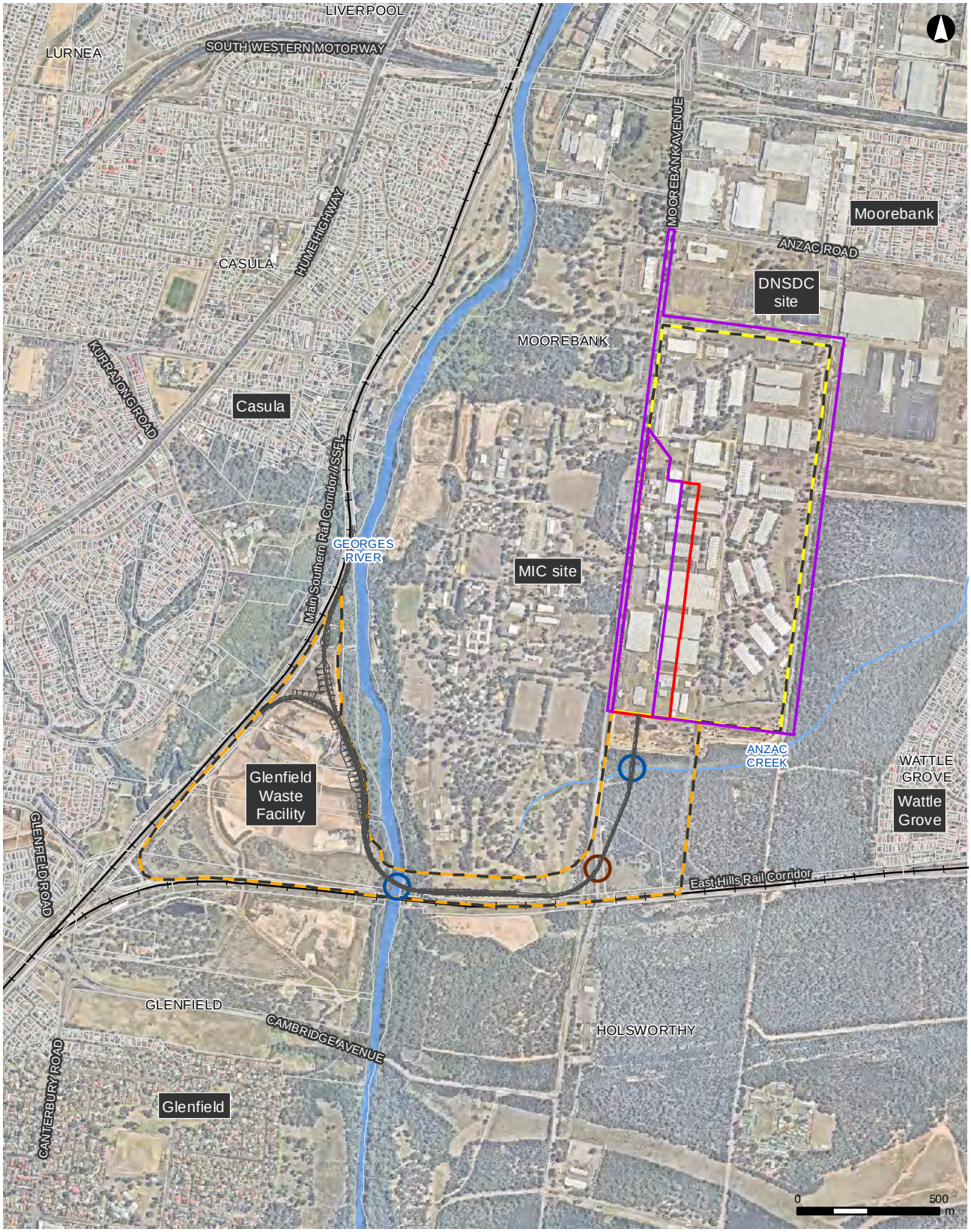
- A number of existing buildings previously utilised by the Department of Defence, comprising a mixture of warehouses, offices and administrative facilities
- An internal road network and large hardstand areas, typically made of asphalt and concrete
- Planted vegetation along site boundaries, walkways, internal roads and areas of open space
- A primary access point, about one kilometre south of the intersection of Moorebank Avenue and Anzac Road and a number of additional general access points along Moorebank Avenue.

Subject to approval of the Stage 1 Proposal, the Stage 1 site, located on the south western portion of the SIMTA site, would be impacted. The Stage 1 site, which partly overlaps the Proposal site, subject to approval, would be cleared and all existing buildings demolished to facilitate construction of an IMT and Rail Link.

The area of overlap between the Proposal site and the Stage 1 site includes the portion of the Stage 1 Proposal construction footprint to the immediate east and north of the IMT, and potentially along the eastern boundary of the Stage 1 site within the Operational area which have previously been identified within the Stage 1 Proposal EIS.

An overview of the SIMTA Project Site, Stage 1 Site and Proposal Site is shown on Figure 2-3.

Additional detail regarding the existing environmental conditions of the Proposal site and surrounds is provided in Section 7 and 8.



LEGEND

- SIMTA project site
- Rail Corridor
- SIMTA site
- SIMTA Stage 1 Site (Operational)
- SIMTA Stage 2 Site
- Rail link (Stage 1 Proposal)
- Creek/River crossing
- Road crossing
- Lot boundary
- Watercourse
- Existing railway

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 5, 141 Walker St | North Sydney NSW 2060
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Scale: 1:20,000 @ A4

Figure 2-3: Overview of the SIMTA Project, Stage 1 Proposal Site and Proposal Site

2.4 Legal Description, ownership and consent

The Proposal site is mostly located within Lot 1 DP1048263, owned by SIMTA; however, a number of additional lots have the potential to be directly impacted by the Proposal. The land to which the Proposal will directly impact is subject to the refinement of the Proposal design, and will be confirmed and assessed in the EIS. A summary of potential lots affected by the Proposal is provided in Table 2-1.

Table 2-1 Properties potentially affected by the Proposal

Lot	DP	Property address / description	Owner
1	1048263	The SIMTA site	SIMTA (Qube Holdings and Aurizon Holdings).
2	1197707	Moorebank Avenue (south of Anzac Road)	Commonwealth of Australia
N/A	N/A	Moorebank Avenue (north of Anzac Road)	Roads and Maritime Services
3	1197707	Defence Joint Logistics Unit (DJLU)	Commonwealth of Australia
3002	1125930	DJLU	Commonwealth of Australia
5	1197707	Boot Land	Commonwealth of Australia

3 PROPOSAL NEED AND JUSTIFICATION

The SIMTA Project, which includes this Proposal, has been identified as an essential component of the NSW Freight and Ports Strategy due to its role in meeting Sydney's future freight needs. The SIMTA Project is closely aligned to achieving effective delivery of National and State government commitments and policy objectives including:

- National strategic planning and policy framework:
  - Australian Infrastructure Plan, 2016
  - National Infrastructure Priority List and Update, 2009 and 2016
  - National Land Freight Strategy Discussion Paper and Update, 2011 and 2012
  - National Ports Strategy, 2011
- NSW strategic planning and policy framework:
  - 'Navigating the Future' NSW Ports' 30 year Master Plan, 2015
  - A Plan for Growing Sydney, 2014
  - State Infrastructure Strategy and Update, 2012 and 2014
  - NSW Freight and Ports Strategy, 2013
  - NSW Long Term Transport Masterplan, 2012
  - NSW 2021: A plan to make NSW number one, 2011
  - Draft Subregional Strategy for the South West Subregion, 2009.

Container trade through Port Botany continues to grow, with more than two million TEUs currently passing through the port annually. Growth in container throughput at Port Botany is expected to continue as evidenced by the removal of the container throughput cap in 2012. It has been identified in government policy and strategies that in order to support future growth, more freight needs to be moved to and from Port Botany via rail. If the current rail mode share is not improved, heavy vehicle traffic on the road network at and around Port Botany could increase by up to four times its current level by 2030.

The SIMTA Project is considered the most viable solution to increase the rail capacity to and from Port Botany by 2030. The Moorebank Precinct has been identified in both Federal and State policies and strategies as the best location for an IMT facility to service the industrial areas of south-western Sydney that has the appropriate proximity to the main arterial road network and a dedicated freight line to Port Botany.

The NSW Government and the Port Authority of NSW have a shared objective of increasing the amount freight transported by rail and improving the efficiency of port-related freight movements across the infrastructure network.

The objectives for the SIMTA Project are to deliver an IMT facility which:

- Is strategically located to utilise existing and future metropolitan, State and National rail freight and road networks, including the SSFL and the M5 and M7 Motorways
- Will provide capacity for an annual throughput of up to 500,000 TEU, as an initial step to meeting the forecast demand of approximately 1,000,000 TEU for Western and South Western Sydney
- Will make a significant contribution to achieving Federal and State land use, freight and logistics policies, including the State Plan target of increasing container freight being transported by rail
- Assists with alleviating freight-related road congestion between Port Botany and Moorebank, particularly along the M5 Motorway
- Is appropriately designed and managed to provide operational efficiencies and to appropriately mitigate impacts on the surrounding environment and local community
- Provides freight storage and distribution opportunities in a strategically appropriate location, in turn providing employment opportunities and associated economic and social benefits.

The Proposal would assist in meeting the objectives for the SIMTA Project as it would provide the warehousing and distribution services within the SIMTA site in proximity to support the operation of the IMT, which in turn would also provide:

- Support for an increased rail-share of container freight movements
- Operational and cost efficiencies for the handling, storage and distribution of freight
- Reduced impacts on the surrounding environment, sensitive receivers and local areas, given efficiencies in supply chain movements.

3.1 Catchment Demand

In 2010/11, the total TEU land transport throughput from Port Botany was 1.76 million TEUs. Total container trade through Port Botany increased to 2.1 million TEUs in 2002/13 and 2.2 million in 2013/14. The rail share of the Port Botany land transport in 2010/11 was 250,000 TEUs, only 14 % mode share, compared to 86 % of freight transported by road.

Based on the current land transport task, an increase in the rail mode share for freight to 28 %, as prescribed by NSW 2021 (NSW Government, 2011), would require 500,000 TEUs moving to/from Port Botany by rail (at 40 %, as previously prescribed in the NSW State Plan 2010, this number would be 715,000 TEUs). Based on the expected increase in TEU throughput at Port Botany, a 28 % rail mode share would equate to approximately 786,800 TEUs in 2016, and 1,411,200 TEUs in 2025.

Achieving these target volumes for TEU movements by rail would require sufficient rail capacity, specifically a combination of metropolitan IMT capacity, metropolitan rail network capacity and port-rail interface capacity.

Previous studies have identified that there will be a shortfall in metropolitan IMT capacity by 2016, even with the rail mode share target being reduced from 40 % to 28 % and factoring in that the Enfield Intermodal Logistics Centre will be operational. By 2025, again allowing for capacity expansion at both Minto and Villawood, the shortfall is more noticeable and road transport volumes could reach up to 4.2 million TEUs.

To achieve the target rail share of 28 %, additional metropolitan IMT capacity is needed. Additional IMT facilities need to be located close to catchment areas where import/export freight has its origins/destinations. This is particularly relevant for the growing region of South West and Western Sydney, as evidenced in the aforementioned NSW Government policies and procedures.

Based on the existing and predicted demand for freight movement by rail as summarised above and provided within the Freight Demand Modelling report provided as part of the Environmental Assessment (EA) for the Concept Plan Approval, the potential catchment for the SIMTA Project is an annual throughput of approximately 1,000,000 TEU. However, the Concept Plan Approval Conditions of Approval limits the capacity of SIMTA Project to 250,000 TEU (for Stage 1) and 500,000 TEU in the future, subject to further approvals.

The Proposal would provide warehousing and distribution facilities within the SIMTA site, which would support the increase in rail mode share for the Sydney freight distribution network. The Proposal, once operational, would also provide support for meeting the catchment demand for rail freight movements to the region of South West and Western Sydney.

4 PROPOSAL DESCRIPTION

4.1 Proposal overview

The Proposal seeks development consent for the construction and operation of Stage 2 of the SIMTA Project, namely warehousing and distribution facilities under Part 4, Division 4.1 of the EP&A Act. The Proposal is expected to operate 24 hours a day, seven days per week.

The key components of the proposal are shown in Figure 4-1 and include:

- Warehousing comprising 300,000m^2 GFA and additional ancillary offices
- Establishment of internal site roads, and connection of the Proposal to the surrounding road network
- Freight village
- Ancillary supporting infrastructure, including:
  - Stormwater, drainage and flooding infrastructure.
  - Utilities relocation and installation.
  - Vegetation clearing, remediation, earthworks, signage and landscaping.
- Possible subdivision of the SIMTA site
- Activation of existing warehousing.

The Proposal would interact with the Stage 1 Proposal (SSD_6766) via the transfer of containers between the intermodal terminal (IMT) (subject of the Stage 1 Proposal) and warehousing and distribution facilities and ancillary infrastructure (subject of this Proposal).

To facilitate operation of the Proposal, the following construction activities would be carried out across and surrounding the Proposal site (area on which the Proposal is to be developed):

- Vegetation clearance
- Remediation works
- Demolition of existing buildings and infrastructure on the Proposal site
- Earthworks and levelling of the proposal site
- Drainage and utilities installation
- Establishment of a site vehicle entrance(s) from Moorebank Avenue
- Establishment of hardstand across the Proposal site
- Construction of warehouses and distribution facilities, ancillary offices and the ancillary freight village
- Construction works associated with signage, landscaping, stormwater and drainage works.

As the Stage 1 Proposal, subject to separate approval to this application, has sought approval for clearance of all vegetation, removal of infrastructure and demolition of buildings within the Stage 1 Construction Area (refer to Figure 2-3). The Proposal would therefore only be seeking approval for the construction activities within the Proposal site that were not proposed to be completed as part of the Stage 1 Proposal. The construction of the Stage 2 Proposal would also involve enabling works within the Stage 1 site, primarily to facilitate the operational interface between the two stages of the SIMTA Project.

All works carried out for the purpose of the Proposal would be in accordance with the Concept Plan Approval Conditions of Approval and Statement of Commitments prescribed as part of the Concept Plan Approval for the SIMTA Project.

LEGEND:

- SIMTA Site Boundary (MP 10_0193)
- Major Entry/Exit point

SIMTA Stage 2 Proposal

- warehousing
- freight village
- possible internal road
- possible internal transfer road

SIMTA Stage 1 Proposal (SSD 14-6766)

- IMT

CLIENT

SIMTA — SYDNEY INTERMODAL TERMINAL ALLIANCE

AURIZON

QUBE

PROJECT MANAGER

TACTICAL GROUP

REIDCAMPBELL

ARCHITECT
Address: Level 15, 124 Walker Street, North Sydney NSW 2060 Australia
Tel: 61 02 9954 5011
Fax: 61 02 9954 4946
Email: sydney@reidcampbell.com
ACN 002 033 801 ABN 28 317 605 875

DRAWING NAME

SEARS DIAGRAM - SIMTA STAGE 2

DATE	SCALE	ISSUE	NORTH
22/04/2016	N.T.S	B	

SHEET No. ASK - 13

4.1.1 Warehousing

The Proposal would provide up to 300,000m^2 of warehousing across the Proposal site with ancillary offices attached. The warehouses would be up to 21 metres in height and of varying size and design. The Proposal would also include some internal fitout of the warehouses, namely the installation of racking and associated services. The Proposal would seek approval for the construction of these warehouses and also the operation of these warehouses by future tenants.

4.1.2 Internal site roads

The Proposal would potentially include a number of internal roads within the Proposal site, namely:

- An internal transfer road that would provide a connection between the warehouses and the intermodal terminal (Stage 1 Proposal). The internal transfer road would be mainly used for the transfer of containers between the intermodal terminal and the warehousing
- A perimeter road that would follow the boundary of the Proposal site. The perimeter road would connect to the road network via Moorebank Avenue and would allow vehicular access to warehouse and distribution facilities to enable the dispatch of goods stored in the warehouses.

4.1.3 Freight village

The Proposal includes an ancillary freight village to support the operation of the SIMTA Project, both the intermodal terminal and warehousing. The freight village would likely comprise site amenities, car parking, operational support facilities and some small-scale commercial businesses. In accordance with the Concept Plan, the freight village would have a GFA of up to 8,000m^2.

4.1.4 Ancillary supporting infrastructure

4.1.4.1 Stormwater, drainage and flooding infrastructure

The Proposal would include the installation of stormwater, drainage and flooding infrastructure across and surrounding the Proposal site. Key features of this infrastructure are likely to include:

- On-site detention
- Bio retention swales
- A drainage bio retention corridor
- Stormwater infrastructure (e.g. pits and pipes) to collect and transport stormwater runoff from the Proposal site and into nominated discharge points
- Stormwater drain(s) to discharge stormwater runoff from the Proposal site to Anzac Creek and to discharge points along the Georges River.

4.1.4.2 Utilities relocation and installation

The Proposal site has historically been connected to nearby public utility networks through Commonwealth owned assets. These connections would be disconnected and redundant infrastructure would be decommissioned. Utilities relocation and installation across the Proposal Site would be completed in a staged manner. The existing utility supply to the Proposal Site would be maintained until the proposed permanent utilities can be provided.

Additional connections to the public utility network; including water, sewer, electricity, telecommunications and potentially gas would be established to support the construction and operation of the Proposal.

4.1.5 Subdivision

It is intended that the SIMTA site would be subdivided as part of this application. The Proposal site would be subdivided into a number of lots for the purpose of segregating the intermodal terminal and warehousing, and also for the tenanting of individual warehouses within the facility.

4.1.6 Activation of existing warehousing

It is intended that should the Proposal be approved by DP&E, during the interim period between determination and demolition and construction activities, existing warehouses on the site (excluding those currently approved or being assessed under separate DAs by Liverpool City Council) will be used for warehousing, distribution and site administration activities.

4.1.7 Traffic circulation

Operational traffic, both heavy and light vehicles, would move through the SIMTA site as generally described in the Concept Plan Approval documentation. Heavy vehicles would be likely to access the Proposal site via the following:

- Stage 1 site, intermodal main, entrance (included within Stage 1) and transferring Proposal site via internal roads
- Proposed northern entrance off Moorebank Avenue
- Proposed perimeter road entrance off Moorebank Avenue.

Heavy vehicles would circulate within the Proposal site via the proposed internal roads and light vehicles, accessing the freight village, would enter and exit the Proposal site via the Moorebank Avenue or the perimeter road.

4.2 Built form controls

The Concept Plan Approval for the SIMTA Project gave consideration to the built form which would be provided in future stages of development for the SIMTA site. The *Urban Design and Landscaping Report* (Reid Campbell, 2011), prepared as part of the Concept Plan Approval provided a set of indicative design parameters which outline the objectives, performance benchmarks and minimum standards for the future development of the SIMTA site. These built form controls will be incorporated into the design for the Proposal. The key built form controls, included in the Concept Plan Approval and relevant to the Proposal are summarised in Table 4-1.

Table 4-1 Built form controls relevant to the Proposal

Proposal component	Built form control
Building siting and setback	Buildings will not be permitted within 18 metres of the front property boundary adjacent to Moorebank Avenue.
Building height:	Maximum height controls proposed for buildings and static/mobile will be adopted for the Proposal, including: Maximum height of 40 metres for lighting poles Building heights within warehouse and distribution facilities zones would not exceed a height of 21 metres. Buildings constructed within the freight village would not exceed a height of 15 metres.
Building design philosophy	The built form, open space and landscape elements of the SIMTA Project site aim to promote visually pleasing and diverse private and public domain elements. It is intended that the built form shall be varied and interesting to provide an attractive and articulated streetscape. The Urban Design and Landscape Report (Reid Campbell, 2011) includes overarching building design objectives and principles, as well as a set of indicative design principles for each land use zone within the SIMTA Project Site. These objectives and principles have been adopted to guide the design of the Proposal.
Building materials and colours	Building materials and colours for any future development within the SIMTA project site will be appropriate for intended use, according to the land use structure. It is intended that an indicative colour palette, minimum performance and sustainability criteria be adopted. The Urban Design and Landscape Report (Reid Campbell, 2011) includes a set of objectives and design principles relating to building materials and colours which have been adopted to guide the design of the Proposal.
Safety and security	Ensuring appropriate safety and security measures through design, installation of systems and ongoing management will be considered on a macro (whole of Project site) and micro (individual tenants and allotments) basis. A range of objectives and design principles are proposed to address the principles of Crime Prevention Through Environmental Design (CPTED), including natural/passive surveillance, territoriality and security.
Water sensitive urban design (WSUD)	A number of WSUD initiatives are proposed to achieve treatment targets, including rainwater tanks, buffer strips, gross pollutant traps, bio-retention systems/rain gardens and bio-swales.

5 STATUTORY PLANNING AND APPROVALS

In accordance with the Concept Plan Approval and the State and Regional Development SEPP, development consent for the Proposal is to be sought under Part 4, Division 4.1 of the EP&A Act (refer to Section 1.5). As a result, the Proposal would require a DA to be submitted to DP&E, accompanied by an EIS.

A summary of the relevant Commonwealth, State and Local Government legislation which are relevant to the Proposal, and the relevant potential environmental impacts of the Proposal in relation to this legislation are summarised in Table 5-1, Table 5-2 and Table 5-3 respectively.

Table 5-1 Commonwealth legislation applicable to the SIMTA Stage 2 Proposal

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Impacts to Matters of National Environmental Significance (MNES), particularly disturbance to listed threatened species, ecological communities and / or migratory species, and impact(s) on Commonwealth land.	The SIMTA Project was declared a controlled action by the Commonwealth Minister of the Environment due to the potential for the Project to impact on listed threatened species and communities, and Commonwealth Land. Approval was granted for the SIMTA Project by the Commonwealth Minister for the Environment on 6 March 2014 (No. 2011/6229). Subject to the implementation of the EPBC Act conditions of approval, no additional assessment or approval is required under the EPBC Act.

Table 5-2 State legislation applicable to the SIMTA Stage 2 Proposal

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
EP&A Act *EP&A Regulation* *State Environmental Planning Policy (Infrastructure) 2007* *State and Regional Development SEPP*	Planning approval pathway determination and any potential impacts on the environment.	Concept Plan Approval (MP 10_0193) for the SIMTA Project was granted on 29 September 2014 by the then Department of Planning (now DP&E). Approval for the Proposal is sought under Part 4, Division 4.1 (SSD) of the EP&A Act, as prescribed by the Concept Plan Approval conditions of approval and the capital investment value of the Proposal (Warehouse and distribution centres) (refer to Section 1.5).
Protection of the Environment Operations Act 1997 (POEO Act)	Impacts of the operation of the Proposal relating to air quality, noise emissions and discharge of polluted water	The Proposal is not a scheduled activity under Schedule 1 of the POEO Act. An Environmental Protection Licence (EPL) for the operation of the Proposal is therefore not required. Some scheduled activities may be undertaken during construction, such as the use of a concrete batching plant and or materials crushing and handling; however, this would be revised and assessed within the EIS.

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
Contaminated Land Management Act 1997 (CLM Act) *State Environmental Planning Policy No. 55- Remediation of Land* (SEPP 55)	Disturbance of contaminated land and potential for further soil contamination	The Concept Plan Approval included a Preliminary Environmental Site Assessment (ESA) and a Phase 1 ESA for the SIMTA site. The Preliminary ESA did not identify 'significant environmental issues which would preclude the development of the SIMTA site' and recommended further detailed investigations. The EIS for the Proposal will include further contamination investigations and would provide a more detailed assessment of potential land contaminants within the Proposal site.
National Parks and Wildlife Act 1974 (NPW Act)	Disturbance of any objects or places of Aboriginal heritage significance	Under Section 89J of the EP&A Act development applications assessed as SSD do not require an Aboriginal heritage impact permit (AHIP) (under section 90 of the NPW Act). The Concept Plan Approval included an Aboriginal Cultural Heritage Assessment for the SIMTA Project site. The assessment identified one Aboriginal artefact within the Proposal Site. Additional information is provided in Section 7.8. The EIS for the Proposal will further these investigations and provide a more detailed assessment of potential Aboriginal heritage impacts on the Stage 2 Site.
Threatened Species Conservation Act 1995 (TSC Act)	Disturbance to listed threatened species and ecological communities	The Concept Plan Approval and the Stage 1 Proposal included the preparation of a Flora and Fauna (including aquatic ecology) and riparian assessments for the SIMTA Project site and surrounds. There is one endangered ecological community recorded within the Proposal site; Castlereagh Scribbly Gum Woodland in the Sydney Basin bioregion. No other threatened flora, fauna or ecological communities have been recorded within the Proposal Site. Additional information relating to biodiversity is provided in Section 7.5. A more detailed assessment of potential biodiversity impacts of the Proposal site and surrounds will be prepared as part of the Stage 2 Proposal EIS.
Noxious Weeds Act 1993 (NW Act)	Spread and impact of weeds	Noxious weeds within the Proposal site will be assessed in the biodiversity reporting for the Proposal.
Fisheries Management Act 1994 (FM Act)	Disturbance to aquatic flora and fauna	Under Section 89J of the EP&A Act, development applications assessed as SSD do not require a permit under section 201, 205 or 219 of the FM Act.

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
Water Act 1912 (Water Act) *Water Management Act 2000* (WM Act)	Disturbance of groundwater aquifers, impacts to flooding behaviour and/or water quality of surrounding water bodies	Under Section 89J of the EP&A Act, development applications assessed as SSD do not require a permit under section 89, 90 or 91 of the WM Act. The Concept Plan Approval included a Stormwater and Flooding Environmental Assessment and a Flood Study and Stormwater Management Report for the Project site, including potential impacts on surrounding water bodies. This was furthered by the Stage 1 Proposal reporting which assessed the potential for flooding relating to the construction of water crossings over Anzac Creek and the Georges River. The EIS for the Proposal will further these investigations and provide an assessment of surface and groundwater flows and flooding impacts.
Roads Act 1993 (Roads Act)	Impacts of the construction and / or operation of the Proposal on traffic flows and works to public and private roads.	Under Section 89K of the EP&A Act consent under Section 138 of the *Roads Act* cannot be refused if it is necessary for the carrying out of SSD authorised by a development consent. The EIS for the Proposal will consider the Roads Act with an application undertaken post determination of the Proposal, as required.
Heritage Act 1977 (Heritage Act)	Disturbance to any object that is of state or local heritage significance	Under Section 89J of the EP&A Act, development applications assessed as SSD do not require a permit under section 139 of the Heritage Act. The Concept Plan Approval included a Non-Indigenous Heritage Assessment for the impacts of the SIMTA Project. Additional assessment of the Stage 1 site and Rail Corridor was also undertaken as part of the Proposal. The non-indigenous heritage assessment noted that the SIMTA site contains a number of intact buildings of heritage significance which date back to the World War II (WWII) area which are an example of a WWII military complex. Additional information is provided in Section 7.9. The EIS for the Proposal will further these investigations and provide an assessment of non-indigenous heritage impacts.
Waste Avoidance and Resource Recovery Act 2001 (WARR Act)	Waste management and potential opportunities for diversion of waste from landfill	A Waste Management Strategy was prepared for the SIMTA Project as part of the Concept Plan Approval. Further waste impact assessment will be undertaken to classify and manage waste for the Proposal (refer to Section 8).
Rural Fires Act 1997 (Rural Fires Act)	Bushfire management/prevention and ensuring the site is suitably protected from the threat of bushfires	Under Section 89J of the EP&A Act development applications assessed as SSD do not require a bush fire safety authority (under section 100B of the Rural Fires Act). An assessment of the SIMTA Project against the relevant factors for bushfire risk was undertaken within the Hazards and Risks Assessment prepared as part of the application for Concept Plan Approval. Further assessment was also provided, for the IMT within the Stage 1 Proposal reporting. The Proposal will further this assessment and provide a bushfire assessment in consideration of the *Planning for Bushfire 2006* (NSW Rural Fire Services) (refer to Section 7).

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
State Environmental Planning Policy No. 33- Hazardous and Offensive Development (SEPP 33)	Management of hazardous and dangerous goods	A Hazard and Risks Assessment was prepared for the SIMTA Project as part of the application for Concept Plan Approval. Further assessment was also provided, for the IMT within the Stage 1 Proposal reporting. Further risk assessment for the management of hazard and dangerous good specific to the Proposal will be provided.
State Environmental Planning Policy No. 64- Advertising and Signage (SEPP 64)	Location and design of signage and impact on the surrounding visual environment	A Visual Impact Assessment Analysis and Urban Design and Landscape Report were undertaken as part of the assessment for Concept Plan Approval. Further assessment was also provided, for the IMT within the Stage 1 Proposal reporting. A visual impact assessment will be undertaken to further discuss the potential visual impacts of the Proposal on the surrounding area (including the potential impacts of signage associated with the operation of the Proposal).
Greater Metropolitan regional Environmental Plan No 2 – Georges River Catchment	Drainage and site runoff including potential impacts on water quality and flooding of the Georges River Catchment	The assessment of the Concept Plan Approval included a Stormwater and Flooding Environmental Assessment and a Flood Study and Stormwater Management Report for the Project site and impacts on surrounding water bodies. Further assessment was also provided, for the IMT within the Stage 1 Proposal reporting. The Proposal will further these investigations and provide an assessment of surface and groundwater flows and flooding impacts (refer to Section 8).

Table 5-3 Local government legislation applicable to the SIMTA Stage 2 Proposal

Legislation	Potentially relevant environmental impacts of the Proposal	Approval and / or assessment
Liverpool Local Environment Plan 2008 (Liverpool LEP)	Impact on the environment and the built form of the Liverpool Local Government Area	The Concept Plan Approval assessment included consideration of the Liverpool LEP. This will be further considered as part of the EIS for the Proposal.
Liverpool Development Control Plan 2008 (Liverpool DCP)	Impact on the environment and the built form of the Liverpool Local Government Area	The Concept Plan Approval assessment included consideration of the Liverpool DCP. As the project is SSD under Part 4, Division 4.1 of the EP&A Act, consideration of the Liverpool DCP is not required.

6 CONSULTATION

6.1.1 Concept Plan Approval consultation

During the preparation of the Concept Plan Environmental Assessment, consultation was carried out with the following parties, in accordance with the Director General's Requirements (DGRs) issued for the Concept Plan under the Transitional Part 3A of the EP&A Act:

- Local, State or Commonwealth government authorities such as:
  - Department of Sustainability, Environment, Water, Population and Communities (now the Department of the Environment)
  - Department of Finance and Deregulation (now Department of Finance)
  - NSW Department of Environment, Climate Change and Water (now Department of Planning and the Environment)
  - NSW Roads and Traffic Authority (now the Roads and Maritime Services)
  - Transport NSW (now Transport for NSW)
  - NSW Rural Fire Service
  - NSW Industry and Investment (now Department of Trade and Investment)
  - RailCorp (now Sydney Trains)
  - Australian Rail Track Corporation
  - Sydney Ports Corporation
  - Liverpool City Council.
- Service and infrastructure providers such as:
  - Sydney Water Corporation
  - Integral Energy (now Endeavour Energy)
  - Jemena
  - Telstra
  - AGL Upstream Investments Pty Ltd.
- Registered Aboriginal Parties (RAPs)
- Specialist interest groups and the public, including adjoining and affected landowners.

All consultation activities and associated techniques were guided by an overall stakeholder engagement strategy.

Consultation with government agencies and service and infrastructure providers continued throughout the public exhibition period of the Concept Plan EA, the preparation of the Submissions Report and as part of the PAC assessment. This consultation included meetings to discuss key aspects and concerns associated with the SIMTA Project, and responding to written submissions received during public exhibition.

Community consultation activities included, but were not limited to:

- Establishment of a community information centre, which provided for face-to-face consultation with community members and other specialist interest groups.
- One-on-one stakeholder meetings, including key community stakeholders
- Establishment of a standalone website (www.simta.com.au[4]), an email feedback system, free-call information line
- Distribution of community newsletters and letters.

[4] This form of communication is still active and has remained active since the Concept Plan Approval consultation.

6.1.2 Stage 1 Proposal consultation

During the preparation of the EIS for the Stage 1 Proposal, consultation was undertaken with key stakeholders, agencies, community members and specialist groups in accordance with the SEARs (SSD-6766) and the SIMTA Project's overarching stakeholder engagement strategy.

Consultation was carried out with a number of parties, including:

- Commonwealth, State and Local government agencies:
  - Commonwealth Department of the Environment
  - Department of Planning and the Environment
  - NSW Environment Protection Authority
  - NSW Office of Environment and Heritage
  - NSW Department of Primary Industries, including the Department of Fisheries and Office of Water
  - NSW Rural Fire Service
  - NSW Health
  - NSW Ports
  - Liverpool City Council
  - Campbelltown City Council.
- Relevant service and infrastructure providers, including:
  - Transport for NSW
  - NSW Roads and Maritime Services
  - Australian Rail Track Corporation
  - Sydney Trains
  - Sydney Water
  - Endeavour Energy
  - Jemena
  - Telstra
  - AGL Upstream Investment Pty Ltd
  - National Broadband Network Company.
- The local community, specialist groups (including Registered Aboriginal Parties (RAPs)) and nearby residents.

Government agency and service and infrastructure providers were consulted with throughout the preparation of the Stage 1 EIS via meetings to discuss the proposal and / or formal written consultation. Consultation continued with these agencies during the public exhibition of the EIS and response to submissions reporting stage, as well as during the PAC Assessment.

Community consultation as part of the Stage 1 Proposal has included the following activities:

- Regular updates to the SIMTA Project website (established during the preparation of the Concept Plan Approval), including updated information regarding the Stage 1 Proposal as it became available, and information regarding the planning and approval process. During the preparation of the EIS, the website was updated on four occasions.
- A dedicated email feedback system (consulting@elton.com.au) which allowed the general public to request information about the Proposal directly. Nine email enquiries were received during the preparation of the EIS.
- A free-call information line (1800 986 465), available between 8:30 am and 5:00 pm weekdays, with a message bank provided outside of these times, for the general public to discuss the Stage 1 Proposal.

- Provision of community information newsletters to nearby residents, providing updates on the Stage 1 Proposal, and notifying residents of any consultation activities proposed.
- Public exhibition of the EIS between 28 May and 26 June 2015. During the public exhibition period, eight submissions were received from government agencies and 226 submissions were received from community members, landowners and special interest groups.

6.1.3 Consultation to be undertaken for the Proposal

The Proposal represents a further progression of the design, construction methodology, operational procedures, and environmental assessment for the SIMTA Project (i.e. the subject of the Concept Plan Approval). As such, SIMTA recognises the importance of continuing to engage with Commonwealth, State and Local Government stakeholders, the community, RAPs, and special interest groups.

The Concept Plan Approval Conditions of Approval and the Statement of Commitments, state that any future DA for the SIMTA Project should include details of the consultation process and outcomes with relevant stakeholders, including (but not limited to):

- *relevant government authorities, such as the Commonwealth DoE, OEH, EPA, DPI, TfNSW, Sydney Trains, Crown Lands, Office of Water and Department of Primary Industries (Fisheries) and, Liverpool Council, Campbelltown Council, Bankstown Council.*
- *Service and infrastructure providers.*
- *Special interest groups and the public, including adjoining and affected landowners.*

The EIS for the Proposal will build on consultation undertaken for the Concept Plan Approval and Stage 1 Proposal and consult, as a minimum, with those key stakeholders identified in the Conditions of Approval (identified above). All consultation to be carried out will be guided by the overarching stakeholder engagement principles that have been used to inform previous consultation.

The process and outcomes of this consultation would be detailed within the EIS to be prepared for the Proposal.

7 KEY ENVIRONMENTAL ISSUES

A summary of the key environmental issues relating to the construction and operation of the Proposal have been identified based on investigations and environmental assessment undertaken as part of the Concept Plan Approval, and to a lesser extent the preliminary investigations undertaken to-date for the Proposal.

7.1 EIS Structure

The EIS to be prepared for the Proposal will be prepared to address the SEARs that have been requested as part of this PEA. In addition, and more specifically, the EIS and associated design and technical specialist reporting will be prepared to address the future assessment requirements specified in Schedule 3 of the Concept Plan Approval as relevant to the Stage 2 Proposal.

It is anticipated that the SEARs will replicate where relevant, and be consistent with, the future assessment requirements specified in Schedule 3 of the Concept Plan Approval. Table A-1 and Table A-2 of Appendix A provides an analysis of the Concept Plan Approval Conditions of Approval and Statement of Commitments considered relevant to the Proposal, and a justification for why some specific Concept Plan Approval Conditions of Approval and Statement of Commitments should be excluded from the SEARs for the Proposal. The EPBC Conditions of Approval will also be considered, where relevant to the Proposal.

Further discussion on the environmental assessment requirements to be addressed in the EIS is provided below. In addition to this, the Concept Plan Approval includes a number of Conditions of Approval which are more procedural rather than impact assessment based. These will be addressed in the EIS (and design) and include the following:

- **Freight Village** – Any future DA for the freight village should include:
  - Employee numbers
  - Details of uses sought
  - Hours of operation for each use
  - Signage; and
  - Parking (Staff and visitor).
- **Environmental Risk Analysis**- an environmental risk analysis would be prepared to identify potential environmental impacts associated with the Stage 2 Proposal (construction and operation), proposed mitigation measures and potentially significant residual environmental impacts after the application of proposed mitigation measures. Where additional environmental impacts are identified through this risk analysis, an appropriately detailed impact assessment of the additional environmental impacts would be included as part of the Stage 2 Proposal DA.

The remainder of the environmental assessment which is required to be undertaken for the Stage 2 Proposal in accordance with the Concept Plan Approval Conditions of Approval and Statement of Commitments is discussed below.

7.2 Traffic and Transport

7.2.1 Existing Environment

A Traffic and Accessibility Impact Assessment and Freight Demand Modelling report were prepared by Arcadis (formerly Hyder Consulting) (2013) as part of the environmental assessment prepared for the Concept Plan. Further traffic counts and modelling was undertaken in 2015 to inform the Stage 1 Proposal EIS. These reports identified the key traffic and transport-related characteristics relating to the existing environment at the SIMTA site, the Stage 1 site and within the surrounding area, which are summarised below.

7.2.1.1 Existing traffic and transport network

Road network

The SIMTA site, including the Proposal site, is located on Moorebank Avenue, south of Anzac Road. Table 7-1 outlines key roads on the road network adjacent to the SIMTA site and the Proposal site.

Table 7-1 Key surrounding roads

Road Names	Road Hierarchy	Characteristics
M5 South West Motorway	Motorway	The M5 South West Motorway (M5) is a 22 km tolled road with generally three lanes in each direction between Camden Valley Way, Prestons and King Georges Road, Beverly Hills. It is operated by Interlink Roads. It forms part of the M5 transport corridor, the main passenger, commercial and freight route between Sydney Airport, Port Botany and South West Sydney. It is also a key part of the Sydney Orbital Network, a series of interconnected roads that link key areas of the Greater Sydney Metropolitan Region.
Moorebank Avenue	State Road5/ Local Road	Moorebank Avenue is currently a two lane undivided road (one lane on each direction) between Cambridge Avenue and the M5 South West (adjacent to the Proposal site) and a four lane undivided road (two lane on each direction) north of the M5 South West. Moorebank Avenue provides a north-south link between Liverpool and Glenfield and forms a grade separated interchange with the M5 South West about 850 metres north of the Proposal. Moorebank Avenue between the M5 South West and Anzac Road is owned and maintained by Liverpool City Council. Moorebank Avenue between Anzac Road and Cambridge Avenue is a private road on Commonwealth land which is publicly accessible.
Anzac Road	Local Road	Anzac Road is a local road that provides an east-west local connection between Moorebank Avenue and Heathcote Road. It provides access to Moorebank Business Park and the residential area of Wattle Grove. Anzac Road is generally a two-lane undivided road. Previous assessments have considered the section of Anzac Road between Yulong Close and Moorebank Avenue. At the intersection of Anzac Road with Moorebank Avenue, Anzac Road is owned by the Department of Defence.
Newbridge Road	State Road	Newbridge Road is an east-west road that provides access to Canterbury Road and Liverpool. Within the study area it is a six lane, divided road that is maintained by Roads and Maritime.
Heathcote Road	State Road	Heathcote Road is an arterial road that connects Heathcote to Liverpool in a north-westerly direction. From Sandy Point to Moorebank, Heathcote Road ranges between a two-lane, undivided road and a four lane, divided road. It is generally used by local and commercial traffic including, the Department of Defence at Holsworthy and is maintained by Roads and Maritime.
Cambridge Avenue	Local Road	Cambridge Avenue is a local road which connects Moorebank Avenue from the south to Macquarie Fields through to Campbelltown. It is generally a two lanes road (one lane each direction). Cambridge Avenue is owned and maintained by Campbelltown City Council. Cambridge Avenue crosses the Georges River via a low level narrow bridge (subject to flooding).

[5] Moorebank Avenue north of the M5 Motorway is classified as a State Road.

Rail network

Freight and passenger rail services located near the SIMTA Site include:

- **The South Sydney Freight Line**, which operates for a distance of 36 kilometres between Birrong and Macarthur in southern Sydney and provides a dedicated rail line for freight related services, allowing passenger and freight services to operate independently in this area.
- **Passenger Rail services**- The SIMTA Site is located near the junction of the Main Southern and East Hills rail lines, with three rail stations located within 3-4 kms from the SIMTA Site.

Other public and active transport infrastructure

Bus route service 901 is operated by Veolia and travels along Moorebank Avenue adjacent to the Proposal site. The 901 bus service operates once every half hour during peak periods, and hourly outside of peak periods.

Sydney's cycling future (Transport for NSW, 2014) commits to completing missing links in the existing bicycle network to the Liverpool CBD. This would include improving bicycle access to the Liverpool City Centre from the south by completing the missing sections of the off-road walking and cycling corridor along Glenfield Creek, between Casula and Liverpool. This improved access would integrate with the cycling routes proposed in the Liverpool Bike Plan (Liverpool Council, 2009).

7.2.1.2 Existing road network performance

The Traffic and Transport Impact Assessment carried out to inform the Stage 1 EIS included an assessment of eight intersections near the SIMTA site, namely:

- Moorebank Avenue / Anzac Road
- M5 Motorway / Moorebank Avenue
- M5 Motorway / Hume Highway
- Moorebank Avenue / Newbridge Road
- Moorebank Avenue / Heathcote Road
- Cambridge Avenue / Glenfield Road
- Cambridge Avenue / Canterbury Road.

This assessment included a summary of the existing network performance of these intersections, as well as future predicted performance, without the operation of the SIMTA site. The traffic modelling identified that under existing (2014) conditions, all eight intersections generally operate within an acceptable level of service, with the exception of Moorebank Avenue / Heathcote Road, which operates at capacity in the AM peak period. During the PM Peak, the Moorebank Avenue / Heathcote Road and Moorebank Avenue / Newbridge Road intersections operate close to capacity.

7.2.2 Previous Studies

A number of studies were carried out to identify and assess the traffic impacts associated with construction and operation of the SIMTA Project, including the IMT and warehousing components, to support the Concept Plan Approval, including:

- Freight Demand Modelling (Hyder Consulting, 2013a)
- Transport and Accessibility Impact Assessment (Hyder Consulting, 2013b)
- Public Transport Analysis (UrbanHorizon, 2011).

Further traffic impact assessment and modelling was also undertaken for the Stage 1 Proposal, namely:

- Construction Traffic Impact Assessment (Hyder Consulting, 2015)
- Traffic and Accessibility Impact Assessment (Hyder Consulting, 2015)
- Preliminary Construction Traffic Management Plan (Hyder Consulting, 2015)
- Preliminary Operational Traffic Management Plan (Hyder Consulting, 2015).

The reporting undertaken for the Stage 1 Proposal relates only to traffic generated by the IMT component of the SIMTA Project, i.e. does not include warehousing which is the subject of the Proposal. Notwithstanding this, the Stage 1 Proposal reporting provides an update to the Concept Plan Approval reporting in relation to existing traffic and traffic growth.

The *Transport and Accessibility Impact Assessment* (2013b and 2015) both assessed the performance of key intersections within the local and regional road networks with and without the SIMTA Project and Stage 1 Proposal, respectively. The assessments were both based on the identification of 'core' and 'inner' areas within which the SIMTA Project (including all stages) is predicted to contribute to traffic growth. The core and inner road network is shown on Figure 7-1.

Figure 7-1 Core and inner road network

A strategic traffic model was prepared to further determine the potential impacts of the SIMTA Project on road network performance. The core area was then modelled using the Paramics microsimulation modelling software to determine what impacts the SIMTA Project would potentially have on traffic performance within the modelled road network, The Paramics model showed that impacts to traffic as a result of the SIMTA Project would be largely confined within the boundary of the 'core' network area.

The larger 'inner' area was also modelled using Paramics, and drew upon outputs from the strategic traffic model and incorporated network capacity issues identified in the traffic and transport report prepared for the M5 South West Widening EIS (Roads and Traffic Authority, September 2010 (now NSW Roads and Maritime Services)). The traffic modelling results showed that on most key roads outside of the core area, peak hour traffic growth resulting from the SIMTA Project is small. The SIMTA Project was determined to have a low impact on the road network within the 'inner area', with impacts largely negligible and restricted to higher order arterial roads only such as the Hume Highway, M5 Motorway and M7 Motorway.

The Transport and Accessibility Impact Assessment noted that when the SIMTA Project is fully developed (i.e. operating at full capacity with a throughput of one million TEU), the greatest amount of traffic growth is forecast along Moorebank Avenue to the north of the SIMTA site. Without the SIMTA Project, strategic traffic modelling forecasts predict between 1.6 and 1.8 percent growth in peak hour traffic along Moorebank Avenue until 2031. This has been revised to a future traffic growth between 1 and 1.4 percent per annum as identified within the Stage 1 Proposal EIS. With the SIMTA Project, traffic growth along Moorebank Avenues is forecast to increase traffic growth on Moorebank Avenue by up to 3.1% per annum.

Heavy vehicle movements would not be made along Anzac Road to or from the Project site; however, minor employee-related light vehicle traffic movements would occur which are not anticipated to impact on traffic performance.

Further, the results of the traffic modelling analysis suggests that the operation of the SIMTA Project at Moorebank would have the potential to reduce the volumes of heavy vehicle movements along the M5 Motorway corridor (including the M5 South West and M5 East) by up to 2,700 movements per day. These heavy vehicle movements would be primarily redistributed to the west of the M5 South West Motorway/Moorebank Avenue interchange in Liverpool, part of South-West and Industrial West of Sydney.

The Traffic and Accessibility Impact Assessment identified that road capacity improvements would be required (periodically) to cater for the traffic demands from both background traffic growth and additional traffic generated by the SIMTA Project. This investigation reviewed existing infrastructure and then identified the need for road and intersection upgrades. The assessment also identified the need for road network improvements when the SIMTA site is fully developed (i.e. operating at one million TEU) (refer to the Traffic and Accessibility Impact Assessment for further information).

The SIMTA Project allows for the unpacking of a proportion of containers received at the SIMTA Site within warehouses and the distribution of their contents. These freight-based activities will generate truck trips (rigid trucks, semi-trailers and B-doubles). In addition, the Proposal will provide employment through the operation of the warehouses and ancillary freight village. The Traffic and Transport Impact Assessment prepared for the Concept Plan Approval included estimated trip generation calculations. The assessment noted that when operating at a throughput of 1,000,000 TEU, and assuming about 200,000 TEUs would be unpacked into warehouses within the SIMTA Project Site, about 2,638 truck movements will be generated each weekday, comprising 1,603 articulated truck movements and 1,035 rigid truck movements carrying unpacked freight. Additional heavy vehicle movements could be generated from:

- The delivery of empty containers to the terminal to de dispatched to Port Botany via the IMT
- The delivery of full containers from other locations to warehouses within the Proposal site, depending on the tenants
- General freight movements to and from the terminal, not dependant on the IMT.

It is anticipated that the Proposal would be constructed after the commencement of the operation of Stage 1 of the SIMTA Project; therefore, the performance of the surrounding road network with consideration of the Stage 1 Proposal is relevant to a future assessment.

The Stage 1 EIS determined that construction traffic associated with the Stage 1 Proposal is not expected to impact on the level of service of nearby intersections. Operation of the Stage 1 Proposal would contribute to reducing freight movements along the M5 Motorway Corridor and result in an increase in traffic movements near the SIMTA site. The Stage 1 Proposal would result in minor impacts on the performance of Moorebank Avenue, Anzac Road, Cambridge Avenue localised sections of the M5 Motorway corridor and intersections along these roads. The operational traffic performance impacts would not result in these roads or intersections operating at or near capacity.

7.2.3 Potential Impacts

Construction

Construction of the Proposal would require the use of heavy vehicles to deliver construction plant, equipment and materials, as well as for the removal of waste, including general construction waste, compound waste and potentially contaminated waste. Additional light vehicle movements would also occur during construction, associated with the construction workforce.

Additional heavy and light vehicle movements associated with the Proposal have the potential to generate the following traffic and transport-related impacts during construction:

- Reductions to intersection and traffic performance along the surrounding road network
- Temporary disruptions and delays to traffic and public transport services
- Changes to access to private properties and businesses near the Proposal
- Cumulative construction impacts associated with simultaneous construction of the Proposal with Stage 1 Proposal and MIC Early Works (Stage 1) Proposal.

Operation

Operation of the Proposal would potentially have the following traffic and transport-related impacts:

- Reduction of traffic and individual intersection performance at existing intersections due to increases in traffic volumes, in addition to those identified in the SIMTA Stage 1 EIS
- Operational traffic movements impacting on road capacity and safety
- Potential increase in traffic on the surrounding road network impacting levels of service in consideration of both the Stage 1 Proposal and future predicted growth.

7.2.4 Further Assessment

The EIS to be prepared for the Proposal would include a construction and operational traffic and transport impact assessment to identify and assess potential impacts of the Proposal on road network performance, and would propose management measures to avoid, minimise and manage these potential impacts where feasible and reasonable.

An analysis of the relevance of the to be undertaken for the Stage 2 Proposal and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Conditions of Approval to be undertaken for the Stage 2 Proposal, the traffic and transport impact assessment to be prepared will include:

“Traffic Impact Assessment that assesses intersection and road network impacts, including impacts on Cambridge Avenue. The traffic assessment shall:

a) undertake detailed model analysis commensurate with the stage, to confirm network operation and identify intersection upgrade requirements;

b) consider the constructability constraints of proposed upgrade(s) at key intersections, such as vehicle sweep paths, geometry and sight lines;

c) assess construction traffic impacts, including:

i. the identification of routes and the nature of existing traffic on these routes;

ii. an assessment of construction traffic volumes (including spoil haulage/delivery of materials and equipment to the road corridor and ancillary facilities); and

iii. potential impacts to the regional and local road network (including safety and level of service) and potential disruption to existing public transport services and access to properties and businesses.

d) assess operational traffic and transport impacts to the local and regional road network, including:

i. changes to local road connectivity and impacts on local traffic arrangements, road capacity/safety;

ii. traffic capacity of the road network and its ability to cater for predicted future growth and

iii. monitoring of vehicle numbers on Cambridge Avenue.

e) provide an updated Traffic Management and Accessibility Plan including:

i. measures to prevent heavy vehicles accessing residential streets to maintain the residential amenity of the local community

ii. public transport;

iii. cyclist facilities; and

iv. driver code of conduct.

In particular, the Traffic Impact Assessment must identify upgrades and other mitigation measures required to achieve the objective of not exceeding the capacity of the following intersections and roads –

a) Moorebank Avenue/ Newbridge Road

b) Moorebank Ave/ Heathcote Road

c) Cambridge Ave

d) M5 Motorway/ Moorebank Avenue

e) M5 Motorway/ Heathcote Road

f) M5 Motorway/ Hume Highway.

7.3 Noise and Vibration

7.3.1 Existing Environment

A *Noise and Vibration Impact Assessment* was undertaken by Wilkinson Murray (2013) as part of the EIS for the Concept Plan Approval. An additional *Noise and Vibration Impact Assessment* (Wilkinson Murray, 2015) was prepared to support the EIS for the Stage 1 Proposal.

The following key characteristics relating to the existing noise environment at the SIMTA site and within the surrounding area have been identified, based on the previous studies:

- The topography of the SIMTA site is moderately flat, with relative levels (RLs) predominantly ranging between 14 and 16 metres Australian Height Datum (AHD). Along the eastern boundary of the SIMTA site, the land rises from about RL 14 metres AHD at each end to a localised peak of RL 22 metres AHD about midway along the length this boundary. Topographic features may influence noise by the way they influence wind direction and speed, and attenuation of site generated noise and vibration. The main topographic feature that will influence potential noise and vibration impacts at the SIMTA site is the ground level rise to the east of the SIMTA site, coupled with medium to heavy density bushland to the east, which contributes to minimising the transmission of noise and vibration generated on the SIMTA site towards residential receivers at Wattle Grove.
- The following residential receiver Noise Catchment Areas (NCAs) are located near the SIMTA site:
  - NCA1 – 400 metres east of the SIMTA site in Wattle Grove and south of Anzac Road
  - NCA2 – 350 metres north of the SIMTA site in Wattle Grove, north of Anzac Road.
  - NCA3 – 850 metres west of the SIMTA site in Casula.
  - NCA4 – more than 1.9 kilometres south-west of the SIMTA site in Glenfield.

  The location of these representative noise catchments are shown in Figure 7-2.

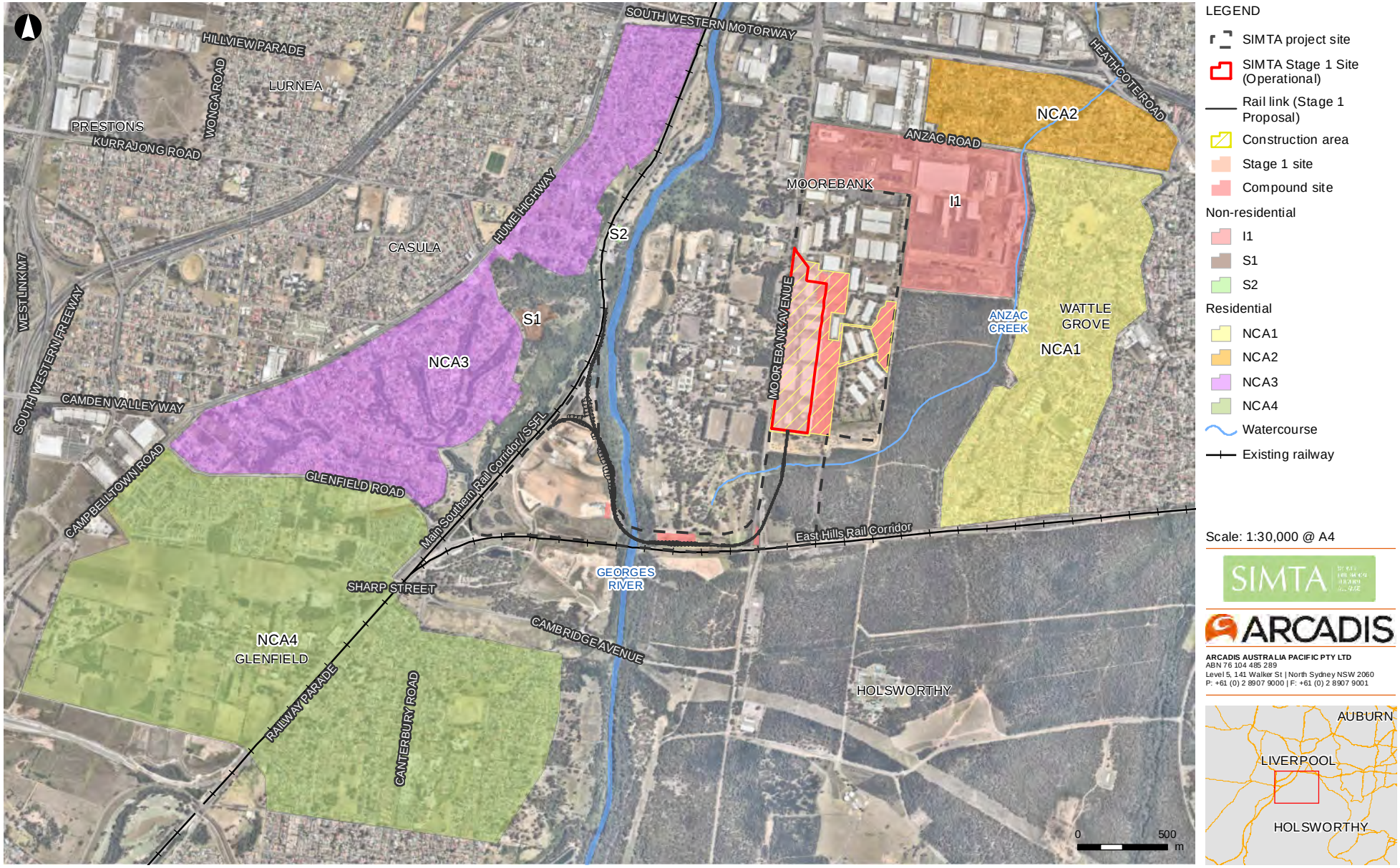
  The existing background noise levels identified at these four NCAs in 2015 as part of the Stage 1 Proposal EIS are summarised in Table 7-2. These rating background noise levels were determined to be consistent with the levels identified in the SIMTA Concept Plan Approval EA.

  Table 7-2 Rating Background Levels at residential NCAs

NCA	Daytime RBL L_{Aeq90}	Daytime RBL L_{Aeq90}	Daytime RBL L_{Aeq90}
NCA1	42	37	37
NCA2	36	36	36
NCA3	41	37	34
NCA4	44	44	37

- There are also three additional sensitive land uses situated near the SIMTA site, namely:
  - S1 - All Saints Senior College located about 1.6 kilometres west of the SIMTA site in Casula
  - S2 - Casula Powerhouse, about 950 metres west of the SIMTA site in Casula
  - The DJLU site (relocated DNSDC site), immediately north of the SIMTA site.

Some of the topography of the SIMTA site (and the Proposal site) would be altered during construction works to be undertaken as part of SIMTA Stage 1 Proposal and therefore may alter noise emissions from the site.



LEGEND

- SIMTA project site
- SIMTA Stage 1 Site (Operational)
- Rail link (Stage 1 Proposal)
- Construction area
- Stage 1 site
- Compound site

Non-residential

- I1
- S1
- S2

Residential

- NCA1
- NCA2
- NCA3
- NCA4

- Watercourse
- Existing railway

Scale: 1:30,000 @ A4

SIMTA

ARCADIS

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 5, 141 Walker St | North Sydney NSW 2060
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Figure 7-2: Noise sensitive receivers near the SIMTA site

Date: 26/04/2016 Path: \\hc-aus-ns-fs-01\jobs\AA008765\L-GIS\A_Current\B_Maps\PEA\AA008765_PEA_Fig7-2_NoiseSensitiveReceivers_r1v2.mxd
Created by : GC
QA by : CV

7.3.2 Previous Studies

The Noise and Vibration Impact Assessments undertaken for the Concept Plan EIS and Stage 1 Proposal EIS identified the existing noise environment, establishing construction and operational noise management levels, noise modelling to identify predicted noise and vibration criteria during construction and/or operation, including noise generated within the SIMTA Project and Stage 1 Proposal works areas and road traffic noise and the recommendation of noise and vibration mitigation measures to be applied.

The previous noise assessments have been undertaken in accordance with the following policy criteria:

- Operational noise criteria were established using the 'intrusiveness' and 'amenity' criteria in the *NSW Industrial Noise Policy*
- Sleep disturbance criteria were established using the EPA's *Noise Guide for Local Government*
- Road traffic noise criteria were established using the EPA's *NSW Road Noise Policy*.
- Construction vibration criteria were established using the EPA's *Assessing Vibration: A Technical Guideline*
- Rail traffic noise criteria were established using the EPA's *Interim Guideline for the Assessment of Noise from Rail Infrastructure Proposals* and *Rail Infrastructure Noise Guideline*.

The Concept Plan Approval and the Stage 1 Proposal provided an assessment of both the IMT and Rail link, which are not relevant to noise expected to be generated from the Proposal.

The Noise and Vibration Impact Assessment prepared for the Concept Plan Approval determined that construction noise levels at nearby receivers are predicted to meet the established noise management levels, except for some residences within NCA3 where noise levels due to the construction of the rail link are predicted to be up to 9 dB(A) above the noise management levels[6].

The predicted operational noise levels at all receivers apart from within NCA3 comply with the INP noise criteria. Within NCA3, the INP criterion was predicted to be exceeded by up to 4 dB(A) when the intermodal terminal is operating at an annual throughput of 1,000,000 TEU[7]. Detailed review of the predicted noise levels at R3 shows that the operation of trucks within the SIMTA site is the major contributor to the levels at R3. Accordingly, the effect of a potential noise barrier has been modelled and shown to reduce operational noise levels by 4 dB(A) within the R3 catchment. As the Proposal would only operate at a maximum 500,000 TEU under the approved Concept Plan Approval, the expected operational noise impacts (IMT, Rail link and warehousing) at nearby residential receivers are not anticipated to as great as what was predicted in the Concept Plan Approval assessment.

[6]As discussed above, the assessment of the Rail link is relevant to the Stage 1 Proposal and not the Proposal.

7.3.3 Potential Impacts

Construction

Construction of the Proposal has the potential to result in the following noise and vibration related impacts:

- Airborne noise from surface construction works, including vehicle movements within the Proposal site
- Minor vibration impacts on buildings near surface works
- Construction traffic noise from the use of heavy vehicles and construction equipment.

There is also the potential that at times, construction works are required outside of standard construction hours for safety reasons. Any works outside of standard construction hours may potentially impact on sensitive receivers surrounding the Proposal site.

Operation

Operation of the Proposal has the potential to result in the following noise and vibration related impacts:

- Increases in industrial noise from the operation of the warehousing and associated equipment
- Increases in road traffic noise from an increase in heavy and light vehicle movements to and from the Proposal site.

7.3.4 Further Assessment

The EIS for the Proposal would include an updated noise and vibration assessment to identify and assess potential impacts of the Proposal on sensitive receivers, and would propose management measures to avoid, minimise and manage these potential impacts where feasible and reasonable.

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the noise and vibration impact assessment to be prepared will include:

a) *'Any future Development Application shall include an updated assessment of noise and vibration impacts. The assessment shall:*

   i. *assess construction noise and vibration impacts associated with construction of the intermodal facility including rail link, including impacts from construction traffic and ancillary facilities. The assessment shall identify sensitive receivers and assess construction noise/vibration generated by representative construction scenarios focusing on high noise generating works. Where work hours outside of standard construction hours are proposed, clear justification and detailed assessment of these work hours must be provided, including alternatives considered, mitigation measures proposed and details of construction practices, work methods, compound design, etc*

   ii. *assess operational noise and vibration impacts and identify feasible and reasonable measures proposed to be implemented to minimise operational noise impacts of the intermodal facility and rail link, including the preparation of an Operational Noise Management and Monitoring Plan; and*

   iii. *be prepared in accordance with: NSW Industrial Noise Policy (EPA 2000), Interim Construction Noise Guideline (DECC 2009), Assessing Vibration: a technical guide (DEC 2006), the Rail Infrastructure Noise Guideline (EPA 2013), Development Near Rail Corridors and Busy Roads Interim Guideline (DoP 2008), and the NSW Road Noise Policy 2011.*

The Concept Plan Approval Statement of Commitments also includes a number of additional criteria for the noise and vibration assessment (as relevant) to be included in the Proposal, including:

a) *The Proponent will undertake further detailed assessments at each application stage after the Concept Plan Approval to provide input to planning and confirm the need for and degree of noise mitigation if required. This should be undertaken based on the most detailed information available at that stage of works. These subsequent assessments should address the DGR requirements for SIMTA proposal as a minimum.*

b) *The Proponent shall consider locating buildings at or near the north-eastern and south-eastern boundaries of the site to provide beneficial acoustic shielding to the nearest residences.*

c) *The Proponent shall consider locating less noise-intensive activities and operations at the north-eastern and south-eastern corners of the site where residences are closest.*

d) *The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined having regard to the outcomes of the operational noise monitoring.*

e) *The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of background noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum.*

f) *Prior to undertaking demolition and construction on-site, a Construction Noise and Vibration Management Plan should be prepared based on details of the proposed construction methodology, activities and equipment. This should consider potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in the report) that may be implemented to minimise any potential impacts, including engineering and management controls.*

7.4 Air Quality

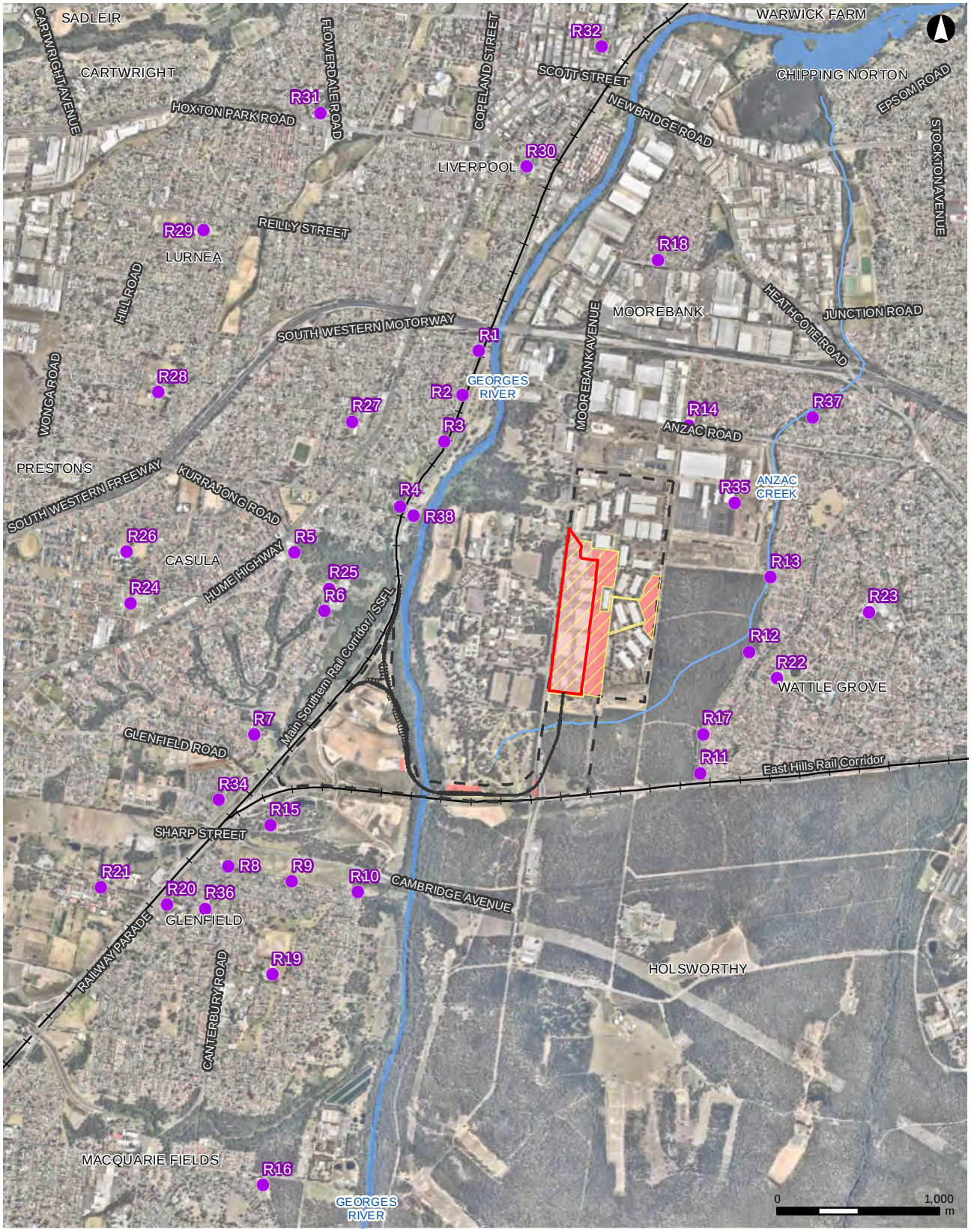
7.4.1 Existing Environment

An Air Quality Impact Assessment was prepared to inform the preparation of the EIS for the Concept Plan Approval (Pacific Environment Limited (formerly PAE Holmes), 2011). A further Air Quality Impact Assessment was prepared as part of the EIS for the Stage 1 Proposal to satisfy the SEARs (Environ, 2015).

The existing environment of the SIMTA site as it relates to air quality includes the following key characteristics:

- Temperature data indicates that January is the warmest month, with a mean maximum annual temperature of 28.1 degrees Celsius (°C) and July is the coldest, with a mean maximum annual temperature of 17.2°C.
- Rainfall data shows that February is the wettest month with a mean rainfall of 108.5 millimetres over 11 rain days. Annually the region within which the SIMTA site is located experiences an average annual rainfall of 869.3 millimetres.
- The annual average particulate matter with a diameter of less than 10 micrometres (PM_{10}) concentrations at Liverpool are consistently below the OEH's annual criteria of 30 micrograms per cubic metre ($\mu g/m^3$).
- For the majority of the year, ambient nitrogen dioxide emissions are less than 20 per cent of the air quality goal.
- Ambient concentrations of carbon monoxide near the SIMTA site are very low and for the majority of the year (more than 90 per cent) are less than ten percent of the air quality goal.
- The maximum 1-hour average ozone concentrations was 0.15 parts per million (ppm) and for the 4-hour averaging period, the maximum concentration was 0.09ppm. The ozone concentrations display seasonal variation, with higher concentrations typically observed during the summer months.

The Air Quality Impact Assessment (Environ, 2015) identified 38 sensitive receptors locations near the Stage 1 Proposal at Casula, Glenfield, Wattle Grove and Liverpool. The sensitive receiver assessment locations included in the Air Quality Impact Assessment for the Stage 1 Proposal are shown on Figure 7-3.



LEGEND

- SIMTA project site
- SIMTA Stage 1 Site (Operational)
- Rail link (Stage 1 Proposal)
- Construction area
- Stage 1 site
- Compound site
- Sensitive receiver
- Watercourse
- Existing railway

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 5, 141 Walker St | North Sydney NSW 2060
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Scale: 1:35,000 @ A4

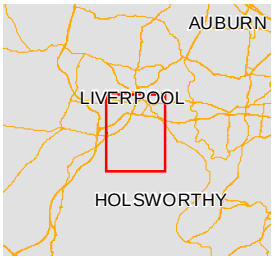


Figure 7-3: Air Quality receivers near the SIMTA site

7.4.2 Previous Studies

The Air Quality Impact Assessment prepared to inform the SIMTA Concept Plan Approval included a worst-case model scenario. The worst case scenario was based on a conceptual busiest hour of operations[8] at the SIMTA site, once fully developed. Pollutant emissions from the following sources were estimated and used to predict potential impacts from the operation of the SIMTA site:

- Locomotives idling on-site during container unloading and loading
- Trucks travelling along Moorebank Avenue and moving and idling within the Project site
- Container handling equipment (forklifts, gantry cranes) unloading / loading containers
- Forklifts operating within warehouse areas.

Potential off-site air quality impacts were predicted using Ausplume dispersion modelling using Ausplume was used to predict potential off-site impacts from the operation of the SIMTA Project. The results of the modelling indicated that operations for the SIMTA Project at maximum capacity (i.e. 1,000,000 TEU throughput) would not result in exceedances of the relevant impact assessment criteria for NO_2, for all averaging periods and at all receptors.

Particulate Matter (PM) modelling predictions were made based on the maximum operating capacity of SIMTA Project, and compared against air quality indicators for coarse particulate (PM_{10}) and fine particulates ($PM_{2.5}$). The modelling indicated that maximum predicted incremental 24-hour PM concentrations at residences would be approximately 8 µg/m3, which equates to 16% of the impact assessment criteria for PM_{10} and 32% of the advisory reporting standard for $PM2_{.5}$.

Regarding regional air quality, the operation of the SIMTA Project would be expected to have a net positive impact by reducing freight transport by truck and reducing the overall emissions to the air shed.

7.4.3 Potential Impacts

The operation of the Proposal would result in both truck and equipment movements within and around the proposed warehouses.

Construction

Construction of the Proposal has the potential to result in the following impacts on air quality:

- Dust and particle matter resulting from the construction activities which have the potential to increase wind erosion and dust dispersion, namely:
  - Vegetation clearing/earthmoving
  - Handling of spoil material
  - Demolition of existing structures
  - Movement of heavy plant and machinery on unsealed areas within the Proposal site.

[8] As discussed above, this is based on a throughput capacity of 1,000,000 TEU, however the Stage 1 Proposal is seeking a maximum throughput capacity of 250,000 TEU.

Operation

Operation of the Proposal would likely result in emissions from vehicle exhaust including heavy and light vehicles, as well as associated equipment required for operation of the warehousing.

7.4.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

a) In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the air quality impact assessment to be prepared will include: *An assessment in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (2005) (or its later version and updates)*

b) Taking into account the final Proposal design with consideration to worst-case meteorological and operating conditions

c) Quantitatively assessing the predicted emission of:

i. Solid particles;

ii. Sulphur oxides;

iii. Nitrogen oxides; and

iv. Hydrocarbons.

d) Assessing cumulative air impacts at a local and regional level (including but not limited to contemporaneous operations such as those of the proposed Commonwealth Government MIT Proposal)

e) A comprehensive air quality management plan that includes at least the following information:

i. Explicit linkage of proposed emission controls to the site specific best practice determination assessment and assessed emissions;

ii. The timeframe for implementation of all identified emission controls;

iii. Proposed key performance indicator(s) for emission controls;

iv. Proposed means of air quality monitoring including location (on and off- off-site), frequency and duration;

v. Poor air quality response mechanisms;

vi. Responsibilities for demonstrating and reporting achievement of key performance indicator(s);

vii. Record keeping and complaints response register; and

viii. Compliance reporting.

7.5 Biodiversity

7.5.1 Existing Environment

A *Flora and Fauna Assessment* was prepared by Hyder (2012) as part of the EA for Concept Plan Approval. A *Biodiversity Assessment Report* (BAR) was prepared to inform the SIMTA Stage 1 EIS (Hyder 2014).

The following ecological constraints and characteristics relating to the Proposal site and surrounding area were identified in previous assessments, and include:

- Two vegetation communities mapped in the Proposal site by DECCW (2009):
  - Castlereagh Scribbly Gum Woodland. This community is present within the Proposal site and is also present throughout the Southern Boot Land (the land located to the south of the SIMTA site). This vegetation community is equivalent to the *Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin* Plant Community Type (ME003). This community is listed as Vulnerable under the TSC Act and Endangered under the EPBC Act.
  - Urban native and exotic vegetation.
- Ground-truthing of the vegetation of the SIMTA site, which encompasses the Proposal site, by Hyder Consulting (2012) found that it consists almost entirely of planted trees with a mown or managed ground layer dominated by exotic grasses, or fragmented regrowth and plantings along drainage lines. There is one small area in the south-east of the Proposal site that supports native understorey, however this has not to date been identified as any Plant Community Type in the NSW Vegetation Types Database.
- An additional three native vegetation communities listed as endangered ecological communities (EECs) under the TSC Act are located in the Boot Land to the south and east of the Proposal site but outside of the Proposal site boundary, including:
  - Castlereagh Swamp Woodland
  - River-flat Eucalypt Forest on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions
  - Freshwater Wetlands on Coastal Floodplains of the NSW North Coast, Sydney Basin and South-east Corner bioregions.
- Three-hundred and ten vascular plant species were identified in the study area (includes the SIMTA site and the Rail Corridor) of previous assessments, including 213 native species, eight non-native species (mainly planted trees) and 89 exotic species. Most species recorded within the Proposal site were planted native and exotic tree species and exotic and native grasses and groundcover in mown grasslands. Populations of two threatened plant species were recorded in the Southern Boot Land to the south of the Proposal site, namely:
  - *Persoonia nutans* (Nodding Geebung), listed as endangered under the TSC Act and EPBC Act
  - *Grevillea parviflora* subsp. *parviflora* (Small-flower Grevillea), listed as Vulnerable under the TSC Act and EPBC Act.

  Acacia pubescens (Downy Wattle), listed as Vulnerable under the EPBC Act and the TSC Act, was recorded at the edge of bushland to the east of the SIMTA site, but outside of the Proposal site boundary.

- Four broad fauna habitat types were identified within the study area of the previous assessments:
  - Remnant vegetation
  - Riparian habitats
  - Landscaped areas
  - Cleared and disturbed areas.

The whole of the Proposal site was mapped as previously disturbed landscaped areas. Native vegetation has been predominantly cleared from these areas and persists as isolated trees amongst expanses of mown exotic and native grasses. Isolated trees, scattered native and exotic shrubs and open grassy areas offer potential habitat resources to birds, microbats and flying-foxes. Other important habitat features, including large hollow-bearing trees, stags, rocky features and hollow logs were not recorded in this habitat.

- Fifty-nine fauna species were identified in the study area of previous assessment, including 38 species of birds, 15 species of mammals, four species of reptiles and two species of amphibians. This included four threatened fauna species:
  - Eastern Bent-wing Bat (*Miniopterus schreibersii oceanensis*), listed as Vulnerable under the TSC Act.
  - Southern Myotis (*Myotis macropus*), listed as Vulnerable under the TSC Act.
  - Eastern Free-tail Bat (*Mormopterus norfolkensis*), listed as Vulnerable under the TSC Act.
  - Grey-headed Flying Fox (*Pteropus poliocephalus*), listed as Vulnerable under the TSC Act and the EPBC Act.

Two of these species, Grey-headed Flying-fox and Eastern Bentwing-bat, were recorded within the Proposal site.

- Fauna habitats within the Proposal site are isolated from adjacent areas of habitat, due to the presence of significant barriers to fauna movement at the site boundaries and within the locality. These barriers include Moorebank Avenue, the East Hills Railway Line and chain-mesh fencing surrounding the SIMTA site. This would limit movement into and through the Proposal site to small terrestrial mammals, reptiles, amphibians, bats and birds.
- Aquatic fauna habitat within the Proposal site is limited to a network of formalised drainage channels located in the south-east. Not all of these channels support permanent water; some flow only ephemerally following rain. These channels drain into Anzac Creek to the east of the Proposal site.

7.5.2 Previous Studies

The *Flora and Fauna Assessment* undertaken for the Concept Plan Approval identified that the SIMTA Project was likely to have impacts on biodiversity values, including threatened ecological communities and threatened flora and fauna species and their habitat.

Assessments of potential impact, using Commonwealth and New South Wales (NSW) assessment guidelines, were prepared for the threatened flora and fauna species and ecological communities known or likely to be impacted by the SIMTA Project. These assessments concluded that the four threatened ecological communities, three threatened fauna and one aquatic fauna species assessed would not be significantly impacted by the SIMTA Project. Potential impacts on these threatened species and communities were considered to be adequately managed through the mitigation measures proposed in this report. The impact assessment for the threatened flora species *Persoonia nutans* concluded that this species would be significantly impacted as a result of the SIMTA Project.

The assessment concluded that impacts on the identified ecological values should be avoided as far as practicable. Where impacts could be avoided, a range of mitigation measures were recommended to ameliorate impacts on the biodiversity values during and following construction.

Following approval of the Concept Plan, a BAR was prepared to inform the SIMTA Stage 1 EIS (Hyder, 2014). The BAR was prepared in accordance with the *Framework for Biodiversity Assessment* (OEH 2014) and included quantification of biodiversity impacts from the Stage 1 site and proposed Rail link, and calculation of the credit offset requirements arising from proposal impacts to native vegetation (including threatened ecological communities), threatened flora and fauna species and their habitats. The BAR found that the biodiversity impacts of the Stage 1 proposal largely resulted from the construction of the Rail link. The Stage 1 site was found to not contain native vegetation, and therefore impacts in these areas did not require further assessment or trigger a requirement for biodiversity offsets.

The Flora and Fauna Assessment and BAR concluded that the main impact of the SIMTA Project on ecological values was related to the Rail link and that the SIMTA site generally includes areas that have been subject to previous disturbance and are of a low ecological value.

The Flora and Fauna Assessment undertaken for the Concept Plan Approval (Hyder Consulting 2012) recommended that a Biodiversity Offset Strategy be prepared to offset the impacts of the SIMTA Project on threatened species and communities in the study area. The Biodiversity Assessment Report for the SIMTA Stage 1 EIS included a Biodiversity Offset Strategy prepared in accordance with the *Framework for Biodiversity Assessment*.

7.5.3 Potential Impacts

The Proposal has the potential to result in a number of impacts to biodiversity during construction and operation which are detailed below. Overall, the Proposal, as it is located on the SIMTA site, would result in considerably less impact to ecological values than that identified within both the Concept Plan Approval and Stage 1 Proposal.

Construction

Construction of the Proposal has the potential to impact on biodiversity, including threatened species, populations and communities. Potential impacts to biodiversity (direct and indirect) would be mostly associated with areas of surface disturbance; however, potential impacts could also occur as a result of surface water discharges.

The mechanisms by which these potential impacts could occur may include:

- Vegetation clearance within the Proposal site
- Potential loss of connectivity between areas of habitat, resulting in habitat fragmentation
- Mortality of individuals
- Introduction and/or spread of noxious weeds and other invasive species
- Mobilisation of sediments into waterways and potential pollution from materials used in the process of construction
- Loss of fauna habitat.

Operation

Impacts to biodiversity during operation of the Proposal may potentially include:

- Fauna injury or mortality may result from collisions with vehicles or plant in operation within the Proposal site, or as a result of increased traffic movements within, and in the vicinity of the Proposal site
- Increased movement of people, vehicles, machinery, vegetation waste and soil may facilitate the introduction of spread of these weeds within the study area
- Accidental spills or leaks (oils, fuel, lubricants and chemicals) on the Proposal site have the potential to result in contaminants being transported to the aquatic environment of Anzac Creek via rainfall runoff
- An increased utilisation of the site by both people and vehicles from current levels, and therefore may potentially impact upon the roosting, breeding and foraging activities of locally occurring fauna, as a result of increased exposure to light, noise, dust, vehicles and people.

7.5.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, a Flora and Fauna Assessment will be prepared which will:

a) *assess impacts on the biodiversity values of the site and adjoining areas, including Endangered Ecological Communities and threatened flora and fauna species and their habitat, impacts on wildlife and habitat corridors, riparian land, and habitat fragmentation and details of mitigation measures, having regard to the range of fauna species and opportunities for connectivity (terrestrial, arboreal and aquatic) across the rail link between the site and the EHPL;*

b) *include a Vegetation Management Plan that has been prepared in consultation with the NSW Office of Water;*

c) *document how impacts to the Persoonia nutans and the Grevillea parviflora subsp. Parviflora flora species have been minimised through the detailed design process;*

d) *include the details of available offset measures to compensate the biodiversity impacts of the proposal where offset measures are proposed to address residual impacts, in particular the following should be considered:*

   i. *as stipulated in principle 2 of 'NSW offset principles for major Proposals (state significant development and infrastructure)', for terrestrial biodiversity, established assessment tools, such as the BioBanking Assessment Methodology (BBAM), are considered best practice;*

   ii. *the Biodiversity Offset Strategy will be undertaken in accordance with the 'NSW offset principles for major Proposals (state significant development and state significant infrastructure)';*

   iii. *offsets shall be identified, and demonstrate that they can be secured.*

The Proposal is unlikely to impact on relating impacts on riparian vegetation, therefore a preparation of Vegetation Management Plan is considered unnecessary. In addition to this the Proposal is unlikely to impact on *Persoonia nutans and the Grevillea parviflora subsp. Parviflora flora.* As a result the EIS would respond to these Concept Plan Approval Conditions of Approval to the extent that they are relevant to the Proposal.

7.6 Stormwater and Flooding

7.6.1 Existing Environment

A Stormwater and Flooding Environmental Assessment and Flood Study and Stormwater Management Report were prepared by Hyder Consulting (2013) as part of the EA for the Concept Plan Approval. Further information was provided within the Stormwater and Flooding Impact Assessment prepared by Hyder Consulting (2015) to inform the SIMTA Stage 1 Proposal EIS. The Stage 1 Proposal assessment identified the following drainage and flooding characteristics relating to the SIMTA site, Rail Link and surrounding area:

- The Proposal site is located within the Georges River Catchment Area.
- The existing topography of the Proposal site is defined by a ridge, which runs along the central portion of the SIMTA site, running parallel to Moorebank Avenue. This ridge results in surface water drainage flowing in an easterly direction towards Anzac Creek to the east of the ridge and towards Moorebank Avenue and the Georges River to the west.
- The surface drainage regime of the SIMTA site is divided into three internal catchment areas and two smaller offsite upstream catchments that drain onto the SIMTA site. All surface water runoff within the SIMTA site is collected through an existing drainage system comprising a mixture of concrete and open channels and discharged to three drainage outlets. Two outlets (Outlets A and B) discharge eastward into Anzac Creek, while the remainder of flows are collected and discharged into the Georges River via the neighbouring MIC site from Outlet C. The existing catchments and drainage outlets relevant to the SIMTA site are shown on Figure 7-4.
- The SIMTA site currently has a number of warehouse style facilities connected by internal roads and is interspersed with trees and grassed areas that provide a mix of pervious and impervious surfaces. Notwithstanding this, subject to approval, the Stage 1 Proposal will alter the topography in the south-western corner of the SIMTA site, by removing buildings and vegetation, raising the surface level and levelling the site.

Two main waterbodies surround the SIMTA site, namely; Anzac Creek and the Georges River. Anzac Creek is a small tributary of the Georges River and is located within the Georges River sub-catchment of the Liverpool District catchment. Anzac Creek is located approximately 50 metres south-east of the Proposal site, and flows east traversing the Rail link proposed as part of the Stage 1 Proposal. The tributary discharges into the Georges River approximately three kilometres north-east of the Proposal site. Flood modelling indicated that upstream of the M5 Motorway Corridor, any flooding event up to the 100 year ARI will be confined to the main channel of Anzac Creek and would not impact the SIMTA site. Downstream of the M5 Motorway Corridor, there is extensive floodplain inundation for events in excess of the five year ARI event, with flooding highly influenced by conditions in the Georges River.

The Georges River is located approximately 750 metres west of the Proposal Site and flows from south to north along the Western perimeter of the adjacent MIC site. At the location of the Rail link, proposed as part of the Stage 1 Proposal, the Georges River is located within the Mid-Georges River sub-catchment of the Liverpool District sub-catchment.

Figure 7-4: Existing stormwater discharge points and approximate catchments of SIMTA site

7.6.2 Previous Studies

The *Stormwater and Flooding Environmental Assessment* (Hyder, 2013) and *Flood Study and Stormwater Management Report* (Hyder, 2013a*)*, which were prepared for the Concept Plan Approval, modelled the existing SIMTA site runoff and estimated on-site detention requirements for an indicative site layout using DRAINS modelling software. On-site detention volumes were estimated to mitigate the potential flooding impacts associated with any additional run-off generated by the SIMTA Project.

A summary of relevant considerations for the Proposal considered throughout these previous assessments are provided below:

- The construction of the SIMTA Project would involve the removal of existing stormwater management structures which may result in an increase of surface flows, volume and velocity across the SIMTA site and may also result in the mobilisation and transport of debris and soils. This could contribute to increased erosion, surface scouring and scouring of water channels, transportation of sand silt and clay off-site into adjacent vegetation and waterways and increased severity and impacts of flood events.
- Retained or constructed hardstand areas would naturally accelerate surface flows across the construction area, while disturbed areas provide a rougher surface that assist in slowing surface water runoff and encourages infiltration of water into the soil profile.
- Construction activities have the potential, without the implementation of mitigation measures, to result in sedimentation which could in turn result in increased turbidity, reduction in water body temperatures and reduction in dissolved oxygen, detrimentally impacting on fish habitat in the Georges River and Anzac Creek.
- The proposed flood impacts of site operations would be negligible for local developments in anything up to a 100 year ARI event, at which point it would be part of a larger systemic issue where the SIMTA site's surface water flow is not the primary contributing factor to flood heights.
- Potential spills of fuels, oils, lubricants or site goods could affect water quality however potential impacts would be negligible due to the surface water detention structures and implementation of spill and emergency response procedures.
- Vegetation clearing and bulk earthworks phases have the potential to expose soils, leaving the SIMTA site susceptible to erosion and deposition into nearby waterways. Construction activities that alter the existing soil profile can potentially expose more reactive soils.
- With the provision of appropriate design/mitigation measures across the SIMTA site, operation of the SIMTA Project would have a negligible impact on downstream flooding impacts up to a 100 year ARI event, at which point flooding impacts would be part of a larger systemic issue where the SIMTA Site's surface water flow is not the primary contributing factor to flood heights.
- During the operational phase of the SIMTA Project, surface water flowing across the SIMTA Site would flow to designated drainage and retention structures that provide for sediment and particulate deposition and detention and retention of surface flows. As a result, sediment loads leaving the SIMTA Site and entering Anzac Creek and/or the Georges River would be minimal.

The previous assessments that have been carried out included a number of recommended mitigation measures relating to stormwater design, erosion and sediment control, water quality treatment and monitoring to be implemented through both construction and operation of the SIMTA Project.

7.6.3 Potential Impacts

The Proposal has the potential to result in similar environmental impacts to those identified previously in the environmental assessments prepared for the SIMTA Concept Plan Approval and, with the exception of the Rail link, the Stage 1 Proposal.

Construction

Construction of the Proposal has the potential to result in the following stormwater and flooding impacts:

- Potential for increase to stormwater flows as a result of removal of existing stormwater management structures
- Reduction in water quality of Anzac Creek and the Georges River from erosion and sedimentation and/or discharge of water into waterways as a result of:
  - Increased stormwater flows
  - Construction activities, including vegetation removal, alteration of site topography, and earthworks
  - Spills or leaks of substances such as oil, hydraulic fluids and soils which enter the stormwater runoff system.

Operation

Operation of the Proposal would potentially have the following stormwater and drainage impacts:

- Impacts to the geomorphology of receiving watercourses from increased surface water runoff, subject to discharge volumes and the point of discharge
- Increased impervious surfaces and/or changes to the total catchment area of existing drainage infrastructure, leading to localised flooding
- Potential for discharge of water which would increase sedimentation and impact on water quality, however this is considered unlikely due to the intended design including surface water detention structures.

7.6.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the EIS for the Proposal will include:

"*an assessment of soil and water impacts for the entire site*". The assessment will:

a) assess impacts on surface and groundwater flows, quality and quantity, with particular reference to any likely impacts on Georges River and Anzac Creek;

b) assess flooding impacts and characteristics, to and from the Proposal (including rail link), with an assessment of the potential changes to flooding behaviour (levels, velocities and direction) and impacts on bed and bank stability, through flood modelling, including:

i. hydraulic modelling for a range of flood events;

ii. description, justification and assessment of design objectives (including bridge, culvert and embankment design);

iii. an assessment of afflux and flood duration (inundation period) on property; and

iv. consideration of the effects of climate change, including changes to rainfall frequency and/or intensity, including an assessment of the capacity of stormwater drainage structures.

7.7 Soil and Contamination

7.7.1 Existing Environment

Soils

The geology and soils of the SIMTA site were considered during the preparation of the EIS's prepared for the SIMTA Concept Plan and Stage 1 Proposal. The underlying geology of the Project site was identified as containing tertiary alluvium. A number of erosional, fluvial and residual soil landscapes are present across the SIMTA site. The majority of the Proposal site is within the Berkshire Park Soil Landscape, a relatively flat and level fluvial soil landscape on Quaternary terraces of the Nepean and Georges Rivers. Soils are poorly structured orange to red clay loams, clays and sands, with texture increasing at depth. Plastic clays are present along drainage lines.

As part of the EIS for the Stage 1 Proposal, a review of the Australian Soil Resource Information System identified that there is an extremely low to low probability of the presence of acid sulfate soil materials at, or near the SIMTA Site.

Contamination

The Concept Plan Approval EA included the preparation of a Preliminary Environmental Site Assessment (ESA) (Golder, 2011). Five areas within or near the Project site were identified as part of the Preliminary ESA as having the potential to contain subsurface contamination, however each of these areas are outside of the Proposal site. These five areas include:

- Area 1 – located immediately south of the SIMTA Site. Historic information suggests that partially remediated areas of unauthorised dumping may have occurred.
- Area 2 – comprising the bushland area south of the SIMTA Site. Historic information indicates that potential unexploded ordinance (UXO) associated with a former grenade range may be present. This area also showed evidence of previous illegal dumping.
- Area 3 – Lot 1 DP825352 owned by Sydney Trains has been subject to extensive filling with the area levelled approximately two to 2.5 metres higher than surrounding areas.
- Area 4 – comprising the south-west portion of the golf course was historically used as part of a mock Viet Cong village. Although the village has been demolished, there is potential tunnel materials buried in the area.
- Area 5 – comprising the Glenfield Quarry and Waste Disposal Facility is located south-west of the SIMTA Site. Extractive and waste disposal activities currently take place at this location in accordance with an EPL. This land is also subject to an ongoing maintenance order.

Potential contaminants of concern within these areas include:

- Heavy metals.
- Polycyclic aromatic hydrocarbons (PAHs).
- Hydrocarbons.
- Semi-volatile organic compounds and volatile organic compounds.
- Phenolic compounds.
- Asbestos.
- Pesticides.
- Unexploded ordnance.
- Landfill gases.

These five areas were subject to additional detailed investigations as part of the Stage 1 Proposal EIS to characterise the nature and extent of contamination and to determine if these areas were suitable for development for the purposed of the Stage 1 Proposal, i.e. an IMT and rail link. JBS&G Australia Pty Ltd (2015) conducted a Phase 2 Environmental Site Investigation and noted no gross or widespread contamination that would restrict development and use of the site.

The Stage 1 Proposal site is considered suitable for ongoing commercial/industrial use, subject to the implementation of the Remediation Action Plan prepared as part of the EIS.

Given the age of the buildings within the Proposal site, there is the potential for asbestos containing materials (ACM) to be present throughout the site within the buildings to be demolished and in areas where fill material is present.

7.7.2 Previous Studies

The SIMTA site has been subject to extensive environmental investigations between 2000 and 2002. A review of these investigations as part of the Preliminary ESA undertaken for the Concept Plan Approval identified that further intrusive investigations were not warranted.

The Preliminary ESA determined that further detailed and intrusive contamination investigations were not considered necessary as the NSW EPA considered that the site was suitable for ongoing commercial and industrial use, subject to the implementation of a Site Management Plan (SMP). The Phase 2 ESA prepared as part of the EIS for the Stage 1 Proposal confirmed that the areas identified as being of concern, within the Stage 1 site, were suitable for ongoing commercial and industrial-related use, subject to the implementation of the Remediation Action Plan. The Remediation Action Plan related to areas within the Stage 1 Proposal site, and does not include the Proposal site.

The Phase 2 ESA also noted that no gross or widespread contamination that was identified would unreasonably restrict development and use of the Stage 1 site, and that this contamination has not migrated off-site into the remaining SIMTA site, including the Proposal site.

7.7.3 Potential Impacts

Construction

Construction of the Proposal has the potential for the following soil and contamination related impacts:

- Impacts to water and soils due to spills or leaks of oil and / or fuel from construction plant and equipment
- Impacts to water and soils due to spills or leaks of other hazardous substances and dangerous goods from construction work
- Exposure of soils resulting in direct erosion impacts which may lead to sedimentation in local watercourses including Anzac Creek and the Georges River
- Disturbance of contaminated soils, resulting in on-site and off-site pollution.

Operation

Subject to the successful remediation (as required, however based on previous studies considered unlikely) or management of contamination, there would be unlikely to be impacts during operation of the Proposal.

7.7.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the EIS for the Proposal will include "*an assessment of soil and water impacts for the entire site including the rail link*".

The assessment will:

a) *Identify and assess the soil characteristics and properties that may impact or be impacted by the Proposal, including acid sulfate soils.*

7.8 Aboriginal Heritage

7.8.1 Existing Environment

An *Aboriginal Cultural Heritage Assessment* was prepared by Archaeological and Heritage Management Solutions (AHMS, 2012) as part of the EA for the Concept Plan Approval, and an *Aboriginal Heritage Impact Assessment* (AHMS, 2015) was prepared as part of the Stage 1 Proposal EIS. These assessments identified the following key characteristics relating to the identified Aboriginal heritage significance at the Project site and within the surrounding area:

- No Aboriginal places are registered within the SIMTA site, predominantly due to the extensive earthworks and development that has historically been undertaken to accommodate the previous DNSDC activities. Further, the RAPs that were involved in these previous assessments indicated that they did not consider the site (SIMTA site or Stage 1 site[9]) to have any Aboriginal heritage value.
- A number of artefacts and potential archaeological deposits (PADs) were identified on and around the SIMTA site, including one identified artefact within the south-eastern corner of the Proposal site. The results of previous Aboriginal heritage field surveys are shown on Figure 7-5.

Figure 7-5 Results of Aboriginal heritage field survey for Stage 1 (identified archaeological findings) (Source: AHMS, 2012a)

[9] The Stage 1 site does not include the Rail link proposed in the Stage 1 Proposal.

7.8.2 Previous Studies

The *Aboriginal Cultural Heritage Assessment* (2012) undertaken for the Concept Plan Approval included the preparation of an archaeological predictive model, informed by a detailed background analysis of previous archaeological investigations in the region. The *Aboriginal Heritage Impact Assessment* (AHMS, 2015) prepared for the Stage 1 Proposal also utilised a similar model.

Aboriginal consultation was undertaken for both the Concept Plan Approval and Stage 1 Proposal. The following registered groups were consulted as part of the Concept Plan Approval:

- Tharawal Local Aboriginal Land Council (LALC)
- Cubbitch Barta Native Title Claimants
- Darug Tribal Aboriginal Corporation
- Daraug Aboriginal Cultural Heritage Assessments
- Tocomwall
- Darug Land Observations.

For the Stage 1 Proposal, the same groups as per the Concept Plan Approval were consulted, as well the following further groups:

- Gandangara LALC
- Darug Custodian Aboriginal Corporation (DCAC)
- Darug Aboriginal Landcare Inc. (DALI)
- Wurrumay Consultancy
- Warragil Cultural Services
- Liverpool City Council Aboriginal Consultative Committee.

A site survey of areas identified through the predictive model as potentially containing Aboriginal cultural heritage value was undertaken in conjunction with RAPs as part of the Concept Plan Approval (refer to Figure 7-5 above) and Stage 1. The results from the Concept Plan Approval identified a number of PAD sites, artefacts and culturally sensitive areas. Stage 1 Proposal findings resulted in the delisting of PAD3, while PAD2 was reconsidered, limited and relabelled as MA14. The investigations identify that one artefact remains on the southern part of the Proposal site.

7.8.3 Potential Impacts

Potential impacts to Aboriginal cultural heritage as a result of the Proposal are expected to be of a lesser extent to those previously identified and addressed in the EIS's prepared for the SIMTA Concept Plan and Stage 1 Proposal, as the majority of items of Aboriginal cultural heritage are located outside of the Proposal site. Overall, the risk of significant impacts to Aboriginal sites and / or artefacts is likely to be low, based on the outcomes of previous studies. This risk if further mitigated by the fact that the Proposal site is located within a highly disturbed setting.

Construction

Construction of the Proposal has the potential to result in the following Aboriginal heritage impacts:

- Potential to damage or destroy Aboriginal an isolated artefact, which is culturally significant to the RAPs
- Potential to encounter previously undiscovered Aboriginal objects, sites or places.

Operation

Subject to further investigations and the implementation of mitigation measures, impacts to Aboriginal heritage during operation of the Proposal are considered unlikely.

7.8.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the Aboriginal Cultural Impact Assessment to be prepared will:

a) *Consider impacts to Aboriginal heritage (including cultural and archaeological significance), in particular impacts to Aboriginal heritage sites identified within or near the Stage 1 Proposal. Where impacts are identified, the assessment would demonstrate effective consultation with Aboriginal communities in determining and assessing impacts and developing and selecting options and mitigation measures (including the final proposed measures).*

7.9 Non-Indigenous Heritage

7.9.1 Existing Environment

A *Non-Indigenous Heritage Assessment* was prepared by Artefact (2013) as part of the EA for the Concept Plan Approval. In addition, a *Non-Indigenous Heritage Assessment* was prepared by Artefact in 2015 to support the Stage 1 Proposal EIS.

The following key characteristics relating to the identified items and areas of non-Indigenous heritage significance at the SIMTA site and within the surrounding area were identified in previous assessments:

- The SIMTA site contains a number of intact store buildings dating back to World War II (WWII) and is an example of a WWII military complex. These buildings include a number of timber post and beam buildings with nine internal bays dating to WWII, some of which are located wholly or partly within the Proposal site. Building types within the SIMTA site are shown on Figure 7-6.
- During the time that the Department of Defence owned and then leased the SIMTA site, the entire site was listed on the Commonwealth Heritage List under the EPBC Act. However, as the Department of Defence no longer lease the site, the Commonwealth heritage listing no longer applies. The Office of Environment and Heritage (OEH) advised (8 October 2014) that these items are not currently considered suitable for listing on the State Heritage Register. Notwithstanding this, the SIMTA site has been recently (gazettal on 18 September 2015) listed as of local significance (item 57A, “Defence National Storage and Distribution Centre) under the Liverpool LEP.
- There are a number of heritage items listed on the Register of the National Estate, NSW State Heritage Register and / or under Schedule 5 of the Liverpool LEP surrounding the SIMTA site (and the Proposal site), including:
  - Casula Powerhouse (former power station), Casula (local listing (Liverpool LEP))
  - Two railway viaducts, Casula (local listing (Liverpool LEP))
  - Glenfield Farm Group, including the homestead, barn (former dairy and stables), Casula (National (EPBC Act), state (NSW Heritage Register) and local listing (Liverpool LEP))
  - Holsworthy Group, including powder magazine and former offices’ mess, corporals club, internment camp, Holsworthy railway station lock-up/goal, Moorebank (National (EPBC Act) and local listing (Liverpool LEP)).
  - Kitchener House (formerly ‘Arpafeelie’), Moorebank (National (EPBC Act) and local listing (Liverpool LEP)).

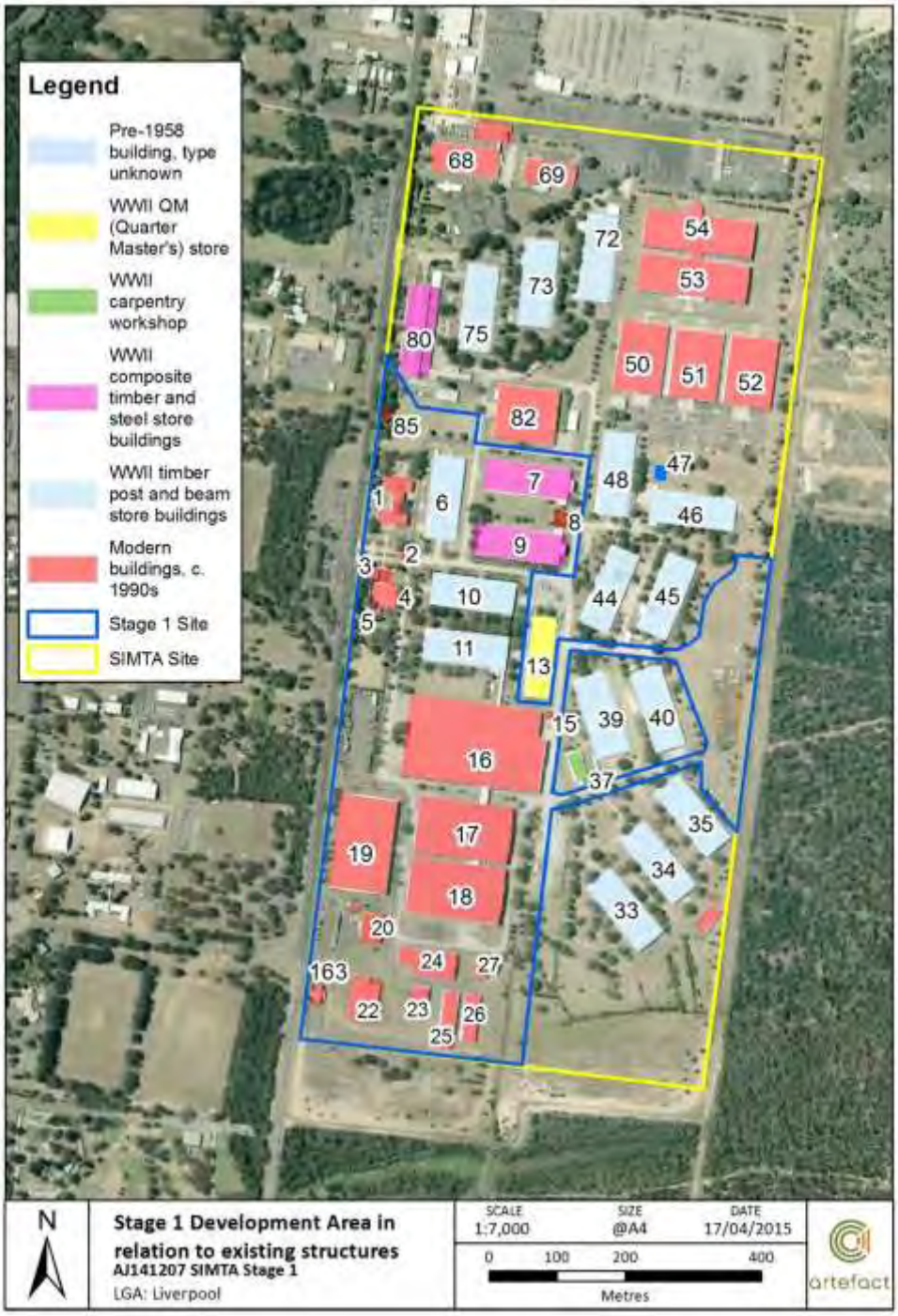


Figure 7-6 Building types within the SIMTA site and the Stage 1 site (Artefact, 2015)

7.9.2 Previous Studies

The *Non-Indigenous Heritage Assessment* provided within the EA of the Concept Plan Approval concluded that the SIMTA Project would have a substantial impact on the heritage significance of the SIMTA site. For the purposes of evaluating the potential impacts on Commonwealth heritage values[10] on the SIMTA site, an evaluation of a number of development options and mitigation measures were considered. These options ranged from conservation, demolition and adaptive reuse of the existing heritage significant buildings on the SIMTA site.

In the PAC's Determination Report (dated 29 September 2014) for the Concept Plan Approval it was noted that the buildings located on SIMTA site are "*not ideal/suitable for modern equipment used for warehousing, and the structures would not meet the current fire safety requirements*". The PAC also noted that "*while the heritage significance of the site is acknowledged, most buildings are unlikely to be suitable for adaptive re-use in a modern warehousing facility, and therefore the proposal* [SIMTA Project] *will impact on the non-indigenous heritage of the site* [SIMTA site]".

The Non-indigenous Heritage Assessment prepared as part of the Concept Plan EIS concluded that further investigation on heritage impacts, including consultation with state agencies, would be undertaken to further identify and mitigate the potential impact of the SIMTA Project on non-Indigenous heritage items within both the SIMTA site and surrounds.

Further investigations undertaken for the Stage 1 Proposal identified concerns with the reuse of buildings located on the Stage 1 site. This was supported within the Secretary's Environmental Assessment Report (dated December 2015) for the Stage 1 Proposal which stated that DP&E concurs with the assessment that the structures, located within the Stage 1 site, "*are not suitable for reuse as they would need to have major conversions to meet safety and engineering requirements*".

7.9.3 Potential Impacts

Construction

Construction of the Proposal would likely have the following impacts on Non-indigenous heritage:

- Demolition or removal of WWII era buildings, the construction of proposed buildings, and landscape alteration through the installation of proposed water, sewerage, trade waste, and power infrastructure within the Proposal site. This is likely, prior to the implementation of mitigation measures, to have a significant impact on the heritage significance of the former DNSDC site (SIMTA site).
- Potential short term amenity impacts on surrounding heritage items (visual, noise and air) due to the location and operation of plant and equipment and vehicle movements during construction.

Operation

Subject to further investigations and the implementation of mitigation measures, impacts to non-Indigenous heritage during operation of the Proposal are considered unlikely.

[10] As discussed above, the SIMTA site is no longer listed as of National significance, however has recently been listed as of local significance.

7.9.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the non-Indigenous Heritage Impact Assessment to be prepared will:

a) consider impacts to historic heritage. For any identified impacts, the assessment shall:

i. outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the measures). Mitigation measures should include (but not be limited to) photographic archival recording and adaptive re-use of buildings or building elements on site)

ii. be undertaken by a suitably qualified heritage consultant(s)

iii. include a statement of heritage impact.

7.10 Visual Amenity, Urban Design and Landscaping

7.10.1 Existing Environment

A *Visual Impact Assessment* was prepared by Reid Campbell (2013) as part of the EA for the Concept Plan Approval. A further *Visual Impact Assessment* was prepared by Reid Campbell (2015) to satisfy the SEARs for the Stage 1 Proposal. The abovementioned assessments identified the existing environment, as it related to visual amenity, urban design and landscape to contain the following key characteristics:

- The SIMTA site is located within close proximity to the M5 Motorway Corridor, which intersects with Moorebank Avenue approximately 800 metres north of the SIMTA site. To the south, the existing East Hills Rail Line, part of the Sydney Trains passenger rail network travels in an east-west direction before connecting to the Main Southern Railway Corridor (including the SSFL) to the west.
- The SIMTA site and Proposal site is surrounded by the residential areas of Wattle Grove to the east, Moorebank in the north, Casula to the west and Glenfield in the south-west. These residential areas generally have minimal or no views due to the significant viewing distances, undulated topography and landform, or shielding by other existing structures and vegetation.
- The SIMTA site is surrounded by expansive areas of natural dense bushland and other lands occupied and owned (both existing and recently vacated) by the Department of Defence and Military related uses.
- Non-residential developments near the SIMTA site are largely industrial, including the former SME site, now the MIC site, immediately west of Moorebank Avenue, and Moorebank Business Park, to the north of the Defence Joint Logistic Facility (to the immediate north of the SIMTA site).

7.10.2 Previous Studies

The *Visual Impact Assessment* included within the EA for the Concept Plan Approval involved the preparation of a 3-dimensional (3D) massing model to inform the likely maximum and realistic visual impact at key viewpoints near the Project site. The modelling was based on siting, setback, height, landscaping and general design principles described in the *Urban Design and Landscape Report*, which was prepared to accompany the EA of the Concept Plan Approval.

The Visual Impact Assessment stated that the SIMTA Project would generally be in keeping with the existing character of the area; however, some relatively high and/or bulky structures and equipment, particularly during construction, may increase the visibility of the SIMTA site beyond its current levels, with some limited and localised visual impacts. Generally, the existing development and topography surrounding the Project site will screen the development from most of the surrounding sensitive receivers.

Overall, the most prominent views of the development would occur at localised boundary points at Moorebank Avenue and Anzac Road and at potentially impacted residential properties, however these impacts are regarded as relatively low because of these areas currently have varying views of the DNSDC operations (infrastructure currently located on the SIMTA site) which are considered reasonably comparable in character with the SIMTA Project. A number of mitigation measures including landscaping, planting and built-form screening were recommended to reduce this overall impact.

In addition, a light spill analysis was undertaken which concluded that the light spill from the SIMTA Project to residential properties, would be well within the required criteria as specified in Australian Standard *AS4282-1997 'Control of Obtrusive Effect of Outdoor Lighting'*.

7.10.3 Potential Impacts

The Proposal has the potential to result in similar environmental impacts, albeit generally to a lesser extent, to those previously identified in the Concept Plan Approval and Stage 1 Proposal. Overall, given the existing infrastructure on the site from its previous use as DSNDC, and the local topography, potential operational

impacts are expected to be manageable with the implementation of mitigation measures and the use of appropriate design principles.

Construction

Construction of the Proposal may potentially result in temporary impacts to the visual amenity, urban design and landscaping as a result of the following:

- The presence of active construction areas and associated lighting
- Vegetation clearance within the Proposal site
- The presence of construction management measures, such as fencing and hoarding.

Operation

Operation of the Proposal has the potential to result in the following visual amenity, urban design and landscaping-related impacts:

- The final design (i.e. built form) of the Stage 1 Proposal could potentially result in visual impacts on surrounding roads (Moorebank Avenue and Anzac Road), Defence uses and potentially impacted residential properties
- The operation of the Proposal could, although unlikely, result in amenity impacts on the surrounding area, particularly having regard to light spill.

7.10.4 Further Assessment

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the EIS to be prepared for the Proposal will include the following with regards to Visual Amenity, Urban Design and Landscaping:

a) a description of the visual significance of the affected landscape.

b) assess the visual impact of the [Stage 2] Proposal on the landscape character of the area, including built form (materials and finishes) and the urban design (height, bulk and scale) of key components including container stacking heights, lighting, bridge crossings, and views to and from the Proposal.

c) include details of hard and soft landscaping treatment and design (including proposed road upgrades relevant to that stage and reinstatement of riparian vegetation).

7.11 Hazards and Risk

A *Hazard and Risks Assessment* was prepared by Hyder Consulting (2013) as part of the EA for the Concept Plan Approval. This assessment identified the following hazards and risks:

- Potential subsurface site contamination (refer to Section 7.7 for more information).
- The presence of asbestos (refer to Section 7.7 for more information). The Concept Plan Approval EA notes that an estimated 15 per cent of buildings present across the SIMTA site contain asbestos.
- Potential risks associated with bushfire.

7.11.1 Previous Studies

The *Hazard and Risks Assessment* included within the EA of the Concept Plan Approval assessed the potential hazards and risks associated with development of an IMT, warehousing and distribution facilities and ancillary services. This report involved an assessment of the existing site conditions including an audit of

asbestos containing material (ACM) by Hibbs & Associates Pty Ltd in 2002 (H&A Audit) along with a qualitative assessment of the risk to occupants of the buildings in which ACM was identified.

The following key potential hazards and risks were identified to potentially be evident during the construction and operation of the SIMTA Project:

- Presence of asbestos in existing structures and the soil
- Potential for soil contamination (including unexploded ordinances)
- Potential transport, storage and handling of dangerous goods
- Bushfire.

This assessment concluded with recommendations for the implementation of a number of management procedures, and some further investigations, to address the potential risks and hazards associated with the development of the SIMTA Project.

7.11.2 Potential Impacts

Construction

Construction of the Proposal has the potential to result in the following hazards and risks:

- Disturbance of contaminated soil and existing structures containing asbestos
- Disposal, transportation off site of asbestos
- Use and storage of dangerous goods during construction.

Operation

Operation of the Proposal has the potential to result in the following hazards and risks:

- On-going management of structures containing asbestos (if retained)
- Use and storage of dangerous goods during operation
- Transportation of dangerous goods to site.

7.11.3 Further Assessment

The EIS to be prepared for the Proposal will further the findings and impact assessment provided in the EA for the Concept Plan Approval. As required by Schedule 3 of the Concept Plan Approval Conditions of Approval the EIS will be accompanied by the following:

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

In accordance with the future environmental assessment requirements outlined in Schedule 3 of the Concept Plan Approval Conditions of Approval, the assessment of Hazards and Risk in the EIS to be prepared for the Proposal will include:

A preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the proposal. Should preliminary screening indicate that the proposal is 'potentially hazardous,' a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP 2011) and Multi-Level Risk Assessment (DoP 2011). The PHA should:

a) *Estimate the risks from the facility.*

b) *Be set in the context of the existing risk profiles for the intermodal facility and demonstrate that the proposal does not increase the overall risk of the area to unacceptable levels.*

c) *Demonstrate that the proposal complies with the criteria set out in the Hazardous Industry Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning.*

8 OTHER ENVIRONMENTAL ISSUES

A summary of other environmental issues, which are not considered key issues, however which have the potential to be evident during the construction and operation of the Proposal are described in Table 8-1. These other issues are generally contained in the Concept Plan Approval Conditions of Approval and Statement of Commitments. Table 8-1 also describes previous studies which have been undertaken for the Concept Plan Approval and the Stage 1 Proposal (as relevant), as well as additional studies to be undertaken for the Proposal as required by either Schedule 3 of the Concept Plan Approval Conditions of Approval and/or Statement of Commitments.

An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, and a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been undertaken to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

Table 8-1 Other potential environmental issues

Environmental issue	Potential impacts	Previous studies/Further Environmental Assessment
Bushfire	Management and protection of the site against bushfire.	The Concept Plan EIS included a Hazards and Risks assessment incorporating bushfire. A further Bushfire Impact Assessment was included within the Stage 1 Proposal. The EIS for the Proposal would include an updated assessment of bushfire risk "against the *Planning for Bushfire 2006* Guidelines (NSW Rural Fire Service)" as required by the Concept Plan Approval Conditions of Approval. The Proposal would also adopt the key objectives identified by the RFS as included with the Concept Plan Approval Statement of Commitments. As per the Concept Plan Approval Statement of Commitments, the Proposal will incorporate the key objectives identified by the Rural Fire Service (RFS) into relevant future designs, in accordance with the following principles: • *Afford occupants of any building adequate protection from exposure to bush fire* • *Ensure operational access and egress for emergency service personnel and residents* • *Provide for ongoing management and maintenance of bushfire protection measures including fuel loads in asset protection zones* • *Ensure that utility services are adequate to meet the needs of the fire fighters*
Economic	Economic impacts are primarily positive and may include: • Job creation, particularly in occupational categories that are matched to the employment profile of the local population • Reduction in the volume of heavy vehicle movements along the M5 corridor	An *Economic Impact Assessment* was undertaken by Urbis (2013) as part of the EA for the Concept Plan Approval. This Economic Impact Assessment would be used (and updated as necessary) to prepare a specific economic impact assessment for the Proposal as part of the EIS.

Environmental issue	Potential impacts	Previous studies/Further Environmental Assessment
	• Reduction in truck vehicle kilometres travelled across the Sydney Metropolitan Network	
Social	Potential social impacts and opportunities relating to impacts of the Stage Proposal (incl. traffic, air quality, health, visual impact and light spill, noise and vibration, employment and crime prevention).	A *Social Impact Commentary* Report was undertaken by Urbis (2013) as part of the EA for the Concept Plan Approval. This report would be used (and updated as necessary), to prepare a specific social impact assessment for the Proposal.
Utilities	Potential relocation of existing services including stormwater, sewer, water, telecommunications and electricity.	A *Utility Strategy Report* was undertaken by Hyder Consulting (2013) as part of the EA for the Concept Plan Approval. A Utilities Servicing Strategy was also prepared by AECOM (2015) as part of the Stage 1 Proposal. The Proposal would include further investigations, as required, and provide details that adequate services are available to the site and/or provide details regarding the proposed servicing upgrades.
Public Infrastructure (S94 Contributions)	Potential impacts on public infrastructure in particular as a result of traffic increases and employee population.	The Stage 2 Proposal would include, as has been identified in the Concept Plan Approval Conditions of Approval: ▪ An assessment of the impacts of the Proposal on local infrastructure, having regard to any relevant Council's Developer Contributions Plan (or equivalent document requiring developer contributions) if relevant; ▪ Subject to the terms of any applicable Voluntary Planning Agreement, a commitment to pay developer contributions to the relevant consent authority or undertake works-in-kind or works as executed Deed towards the provision or improvement of public amenities and services. Note: This requirement may be satisfied subject to the terms of any applicable Voluntary Planning Agreement; and ▪ A commitment to undertake vehicle monitoring on Cambridge Avenue in accordance with Traffic and Transport requirement d).Should any monitoring reveal the need for improvement works within the Campbelltown LGA as a result of the proposal, the Proponent may be required to contribute towards local road maintenance or upgrades. ▪ **Note:** The Concept Plan Modification currently under assessment for determination by DP&E proposed to remove the Statement of Commitments relating to s94 contributions. As a result, this commitment may not be relevant at

Environmental issue	Potential impacts	Previous studies/Further Environmental Assessment
		the time of preparing the EIS, depending on the determination outcome from DP&E.
Waste	Disposal of waste during construction and operation.	A *Waste Management Strategy* was prepared by Hyder Consulting (2013) as part of the EA for the Concept Plan Approval. The Proposal would include detail within the EIS to ensure that "*liquid and/or non-liquid waste generated at the site during development is classified accordingly, and where transported from the site, is directed to an appropriate waste management facility permitted to accept the materials*" as required by the Concept Plan Approval Conditions of Approval.
Ecologically Sustainable Development (ESD)	• Opportunities for beneficial impacts from energy and water conservation, waste minimisation and resource recovery. • Regional ESD benefits associated with the shift toward rail freight over current road. • Increased local employment opportunities.	The Proposal would have consideration to the principles of ESD as required by the Concept Plan Approval Conditions of Approval and the EP&A Regulations.
Health	• Based on the results in the Concept Plan Approval, there is an estimated risk of increased incidence of selected health outcomes due to increased exposure to $PM_{2.5}$ (risk of chronic mortality <1:100,000). • Risk of other health outcomes are <1:100,000, which is considered to be of no cause for concern.	The Concept Plan Approval Conditions of Approval do not prescribe any specific assessment requirements relating to Health. However, the Concept Plan Approval Statement of Commitments, requires a further health impact assessment for the Proposal, including: ▪ *Discussion of the known potential developments in the local region.* ▪ *Assessment of the impact on the environmental values of public health.* ▪ *Assessment of local and regional impacts including health risks.* *This impact assessment would be undertaken with reference to the Centre for Health Equity Training, Research, an Evaluations' practical guide to impact assessment (August 2007).*
Greenhouse gas / Climate Change	• Flooding of infrastructure. • Storm / heat damage to infrastructure. • Increased operating costs due to carbon pricing.	The Concept Plan Approval Conditions of Approval do not prescribe any specific assessment requirements relating to Greenhouse gas and Climate Change. However As stated in the Concept Plan Approval Statement of Commitments, a Greenhouse Gas Management Plan in accordance with the *Greenhouse Gas Assessment* would be prepared for the EIS of the Proposal. A Marginal

Environmental issue	Potential impacts	Previous studies/Further Environmental Assessment
		Abatement Cost Curve would also be considered to assess commercial opportunities to reduce reliance on a single source of energy and to identify methods to reduce greenhouse gas emissions, where appropriate. Also, a C*limate Change Adaptation Assessment* will be prepared and will include: • A review of climate change projection data applicable to the Proposal site. • Highlight significant climate change risks and identify adaptation strategies. • Input during design to limit climate change where reasonable and feasible.

9 CONCLUSION AND SUMMARY

This PEA supports SIMTA's request for SEARs in relation to the Proposal to seek development consent for construction and operation of part of the SIMTA Project, namely the warehouse and distribution facilities, under Part 4, Division 4.1 of the EP&A Act.

The Proposal represents the second stage of the SIMTA Project, which received Concept Plan Approval (MP 10_0193) from the PAC on 29 September 2014.

The key components of the Stage 2 Proposal comprise:

- Warehousing comprising 300,000m^2 GFA and additional ancillary offices
- Establishment of internal site roads, and connection of the Proposal to the surrounding road network
- Freight village
- Ancillary supporting infrastructure, including:
  - Stormwater, drainage and flooding infrastructure.
  - Utilities relocation and installation.
  - Vegetation clearing, remediation, earthworks, signage and landscaping.
- Possible subdivision of the SIMTA site
- Activation of existing warehousing

A key part of the EIS for the Proposal will be to continue the consultation which has previously been undertaken with government agencies, the local community, specialist interest groups, RAPs and affected landowners that has been previously carried out as part of the Concept Plan Approval and Stage 1 Proposal. This consultation will be undertaken periodically throughout the preparation of the EIS and assessment of the Proposal.

The design, EIS and associated technical specialists reports will address the requirements of Schedule 3 of the Concept Plan Approval and provide further assessment on the following key issues:

- Traffic and Transport
- Noise and Vibration
- Air Quality
- Biodiversity
- Stormwater and Flooding
- Soil and Contamination
- Aboriginal Heritage
- Non-Indigenous Heritage
- Visual Amenity, Urban Design and Landscaping
- Hazard and Risk.

The EIS for the Proposal will also provide an environmental assessment on other environmental issues.

In summary, this PEA requests the issue of SEARs, by the Secretary of the Department of Planning and Environment for the preparation of an EIS for the Proposal under clause 3 of Schedule 2 of the EP&A Regulation. Schedule 3 of the Concept Plan Approval included a comprehensive list of future environmental assessment requirements which are considered suitable for the assessment of the Proposal. Therefore, SIMTA requests that the SEARs be consistent with the requirements of Schedule 3 of the Concept Plan Approval, and not provide any further environmental assessment requirements.

It should be acknowledged that the Concept Plan Approval Conditions of Approval and Statement of Commitments are not all relevant to the Proposal. An analysis of the relevance of the Concept Plan Approval Conditions of Approval and Statement of Commitments, as well as a justification as to why particular conditions and commitments are not proposed to be considered as part of the EIS for the Proposal has been carried out to support this PEA and is provided in Table A-1 and Table A-2 of Appendix A.

APPENDIX A CONCEPT PLAN CONDITIONS OF APPROVAL AND STATEMENT OF COMMITMENTS

Table A-1 SIMTA Concept Plan Conditions of Approval and analysis of relevance to the Proposal

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Schedule 3 Future assessment requirements		
2. General Requirements		
a. Include a detailed project description, including construction, operation, maintenance, and staging;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Include details of measures to be implemented to avoid, minimise, manage, mitigate, offset and/or monitor the impacts of the project (including, but not limited to, the following listed issues);	✓	The EIS for the Proposal will be prepared to address this condition of approval.
c. Include details of the consultation process and outcomes with relevant stakeholders, including (but not limited to): i. relevant government authorities, such as OEH, EPA, DPI, TfNSW and DoE, Liverpool Council, Campbelltown Council, Bankstown Council; ii. service and infrastructure providers; and iii. Special interest groups and the public, including adjoining and affected landowners.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
d. These requirements shall be addressed for each Development Application and shall apply to the extent reasonably required by the particular application and to the land the subject of the relevant stage. Note: Soil and water must be addressed in the Stage 1 Development Application for the entire site including rail link.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
e. These requirements shall be addressed for each Development Application and shall apply to the extent reasonably required by the particular application and to the land the subject of the relevant stage. Note: Soil and water must be addressed in the Stage 1 Development Application for the entire site including rail link.	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Air Quality Any future Development Application shall include a comprehensive air quality impact assessment for each stage of the proposal, including:		
a. An assessment in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (2005) (or its later version and updates;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Taking into account the final project design with consideration to worst-case meteorological and operating conditions;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
c. Quantitatively assessing the prediction emission of: i. Solid particles; ii. Sulphur oxides; iii. Nitrogen oxides; and iv. Hydrocarbons.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
d. Assessing cumulative air impacts at a local and regional level (including but not limited to contemporaneous operations such as those of the proposed Commonwealth Government MIT; and	✓	The EIS for the Proposal will be prepared to address this condition of approval.
e. A comprehensive air quality management plan that includes at least the following information: i. Explicit linkage of proposed emission controls to the site specific best practice determination assessment and assessed emissions; ii. The timeframe for implementation of all identified emission controls; iii. Proposed key performance indicator(s) for emission controls; iv. Proposed means of air quality monitoring including location (on and off-site), frequency and duration; v. Poor air quality response mechanisms; vi. Responsibilities for demonstrating and reporting achievement of key performance indicator(s); vii. Record keeping and complaints response register; and viii. Compliance reporting.	✓	The EIS for the Proposal will be prepared to address this condition of approval. Refer to comments on the Best Practice Review provided below.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Best Practice Review Any future Development Application shall include the preparation of a comprehensive review of intermodal operational best practice process design, emission control and management measures that might feasibly and reasonably be applied to each stage of the project, and to benchmark those measures against best practice. The review should:		
Air Quality: a. Clearly demonstrate that the Proponent will at each project stage adopt and implement best practice facility and process design and management measure to the extent that is reasonably practicable, to minimise operational air pollutant and noise emissions at the terminal and on the rail link;	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
b. Include a detailed evaluation of feasible and reasonable mitigation and management measures including: i. assessment of best practice international emission standards for locomotives and non-road plant and equipment; ii. assessment of retrofit opportunities for older vehicles, locomotives and equipment; iii. maintenance and operational practices for vehicles, locomotives and equipment; iv. electrification of terminal plant; v. reduction of 'long-duration' idling of diesel locomotives, prime movers and cargo handling equipment through: vi. driver/operator training about how to reduce air quality impacts associated with 'long-duration' idling; vii. automatic engine shut down/start up system controls whereby engine stopping or starting is implemented without operator action; viii. 'shore power connection' being electricity mains plug-in points for enabling locomotives and trucks to switch over to mains power and shut down main engines otherwise used to generate power required for: ix. transport refrigerated units/containers; x. cabin climate control; and xi. other accessories and equipment.	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
xii. the application of queuing theory to minimise truck loading/unloading wait times and resultant queuing and idling in the terminal facility and on access roads.		
c. Include predicted annual cumulative, daily and one minute amounts of air pollutants emitted and non-renewable fossil fuel consumed (by typical diesel locomotives, prime movers, fixed body trucks, yard trucks/holsters and cargo handling equipment expected to regularly operate at the terminal) as the basis for defining the term 'long-term' duration idling as it would apply to the terminal facility.	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
The following noise requirements shall be included in the best practice review: d. Assessment of an ongoing noise compliance and response system;	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
e. Assessment for the need of an automatic rolling stock wheel defect detection and response system;	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
f. Identification of all feasible and reasonable measures to minimise and mitigate noise impacts from the operation of the terminal and rail link;	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
g. Site layout and operations options to: i. eliminate the need to reverse vehicles and plant (not dedicated to on site operations); and ii. where reversing vehicles and plant is unavoidable only reversing such vehicles and plant in noise attenuated enclosures.	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
h. Assessment of alternative options to the use of traditional 'beeper' type reversing/ movement alarms; and	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
i. Framework for on and off-site noise monitoring during operation.	×	The Best Practice Review relates to the intermodal terminal and Rail link component of the SIMTA Project (Stage 1). A Best Practice Review was undertaken as part of the Stage 1 EIS in accordance with the Concept Plan Approval Conditions of Approval. A Best Practice Review is not relevant or required for the Proposal, as it relates to warehouse and distribution facilities only, not the intermodal terminal, within the SIMTA site.
Traffic and transport Any future Development Application shall include a Traffic Impact Assessment that assesses intersection and road network impacts, including impacts on Cambridge Avenue. The traffic assessment shall:		
a. Undertake detailed model analysis commensurate with the stage, to confirm network operation and identify intersection upgrade requirements;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Consider the constructability constraints of proposed upgrade(s) at key intersections, such as vehicle sweep paths, geometry and sight lines;	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
c. Assess construction traffic impacts, including: i. the identification of routes and the nature of existing traffic on these routes; ii. an assessment of construction traffic volumes (including spoil haulage/delivery of materials and equipment to the road corridor and ancillary facilities); and iii. potential impacts to the regional and local road network (including safety and level of service) and potential disruption to existing public transport services and access to properties and businesses.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
d. Assess operational traffic and transport impacts to the local and regional road network, including: i. changes to local road connectivity and impacts on local traffic arrangements, road capacity/safety; ii. traffic capacity of the road network and its ability to cater for predicted future growth and iii. monitoring of vehicle numbers on Cambridge Avenue.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
e. Provide an updated Traffic Management and Accessibility Plan including: i. measures to prevent heavy vehicles accessing residential streets to maintain the residential amenity of the local community ii. public transport; iii. cyclist facilities; and iv. driver code of conduct.	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
In particular, the Traffic Impact Assessment must identify upgrades and other mitigation measures required to achieve the objective of not exceeding the capacity of the following intersections and roads – f. Moorebank Avenue/ Newbridge Road g. Moorebank Ave/ Heathcote Road h. Cambridge Ave i. M5 Motorway/ Moorebank Avenue j. M5 Motorway/ Heathcote Road k. M5 Motorway/ Hume Highway.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
Rail		
Any future Development Application shall address the requirements of TfNSW and include detailed design and engineering drawings for the rail link and include evidence of consultation with: a. TfNSW, particularly in relation to the future Moorebank Station site, use of the existing EHPL corridor and connections to the SSFL; and	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
b. The EPA where the rail line traverses the Glenfield Waste Facility.	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
Any future Development Application shall include an assessment of the impacts of the rail link on the Glenfield Waste Facility, including: c. Details of the quantity of landfilled waste to be removed, the location from where it will be removed, the methodology to be utilised and the estimated timeframe for the removal and reburial;	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
d. Proposed measures to mitigate odour impacts on sensitive receivers, including an undertaking to apply daily cover to any exposed waste in accordance with benchmark technique 33 of the document Environmental Guidelines: Solid Waste Landfills, NSW EPA 1996;	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
e. Any proposed impacts on pollution control and monitoring systems including existing groundwater and landfill gas bores and their subsequent repair/ replacement;	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
f. The proposed methodology to ensure that the landfill barrier system disturbed in the removal process is replaced/ repaired to ensure its ongoing performance. The Proponent should detail matters such as sub grade preparation/ specifications, line installation/ reinstallation procedures and construction quality assurance procedures;	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
g. A commitment to providing the EPA with a construction quality assurance report within 60 days of the completion of the works referred to in (d) above; and	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
h. An overview of any access and/or materials/ equipment storage arrangements with Glenfield Waste Facility in relation to the construction of the project.	×	The Proposal does not include a rail component; therefore this condition is not considered relevant.
Noise and Vibration Any future Development Application shall include an updated assessment of noise and vibration impacts.		
a. The assessment shall: i. assess construction noise and vibration impacts associated with construction of the intermodal facility including rail link, including impacts from construction traffic and ancillary facilities. The assessment shall identify sensitive receivers and assess construction noise/vibration generated by representative construction scenarios focusing on high noise generating works. Where work hours outside of standard construction hours are proposed, clear justification and detailed assessment of these work hours must be provided, including alternatives considered, mitigation measures proposed and details of construction practices, work methods, compound design, etc	✓	A construction noise and vibration assessment will be prepared for the Proposal as described in Chapter 4 of this PEA. The assessment will not evaluate impacts associated with the intermodal facility and rail link as this forms part of Stage 1 of the SIMTA Project and is not relevant to construction noise associated with the Proposal.
ii. assess operational noise and vibration impacts and identify feasible and reasonable measures proposed to be implemented to minimise operational noise impacts of the intermodal facility and rail link, including the preparation of an Operational Noise Management and Monitoring Plan; and	✓	An operational noise and vibration assessment will be prepared for the Proposal as described in Chapter 4 of this PEA. The assessment will not evaluate impacts associated with the intermodal facility and rail link as this forms part of Stage 1 of the SIMTA Project and is not relevant to construction noise associated with the Proposal.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
iii. be prepared in accordance with: NSW Industrial Noise Policy (EPA 2000), Interim Construction Noise Guideline (DECC 2009), Assessing Vibration: a technical guide (DEC 2006), the Rail Infrastructure Noise Guideline (EPA 2013), Development Near Rail Corridors and Busy Roads Interim Guideline (DoP 2008), and the NSW Road Noise Policy 2011.	✓	The Noise and Vibration Impact Assessment to be prepared for the Proposal will be undertaken in accordance with these policies and guidelines.
b. All site-dedicated locomotives must meet EPA Noise Limits for Locomotives contained within the NSW operational rail licences for operation of new or substantially modified locomotives operating on the NSW network; and	×	The Proposal does not include the use of locomotives. This condition is relevant to Stage 1 of the SIMTA Project and was considered in the Stage 1 EIS.
c. Any future application shall include a train noise strategy including, but not limited to, train operational procedures and driver training that minimise noise on the rail link and within the intermodal terminal.	×	The Proposal does not include a rail component and would not generate train noise. This condition is relevant to Stage 1 of the SIMTA Project and was considered in the Stage 1 EIS.
Soil and Water Any future Development Application for stage 1 shall include an assessment of soil and water impacts for the entire site including rail link. The assessment shall:		
a. Assess impacts on surface and groundwater flows, quality and quantity, with particular reference to any likely impacts on Georges River and Anzac Creek;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Assess flooding impacts and characteristics, to and from the project (including rail link), with an assessment of the potential changes to flooding behaviour (levels, velocities and direction) and impacts on bed and bank stability, through flood modelling, including: i. hydraulic modelling for a range of flood events; ii. description, justification and assessment of design objectives (including bridge, culvert and embankment design); iii. an assessment of afflux and flood duration (inundation period) on property; and iv. Consideration of the effects of climate change, including changes to rainfall frequency and/or intensity, including an assessment of the capacity of stormwater drainage structures.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
c. Identify and assess the soil characteristics and properties that may impact or be impacted by the project, including acid sulfate soils;	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
d. Include a contamination assessment in accordance with the guidelines made under the Contaminated Land Management Act 1997 and in consultation with the EPA for the subject site including the Glenfield Waste Facility. The assessment shall include: i. the potential environmental and human health risks of site contamination on the project site; ii. a Remediation Action Plan; iii. consideration of implications of proposed remediation actions on the project design and timing; and iv. a Phase 2 environmental site assessment of the project site including rail corridor.	✓	A contamination assessment will be prepared to inform the EIS for the Proposal which will largely address this condition of approval. The assessment will not include an assessment of the Glenfield Waste Facility (and or rail link) as this was undertaken as part of the contamination investigations undertaken as part of the SIMTA Stage 1 EIS and is not relevant to this Proposal.
Heritage Any future Development Application shall assess heritage impacts of the proposal. The assessment shall:		
a. Consider impacts to Aboriginal heritage (including cultural and archaeological significance), in particular impacts to Aboriginal heritage sites identified within or near the project should be assessed. Where impacts are identified, the assessment shall demonstrate effective consultation with Aboriginal communities in determining and assessing impacts and developing and selecting options and mitigation measures (including the final proposed measures); and	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Consider impacts to historic heritage. For any identified impacts, the assessment shall: i. outline the proposed mitigation and management measures (including measures to avoid significant impacts and an evaluation of the effectiveness of the measures). Mitigation measures should include (but not be limited to) photographic archival recording and adaptive re-use of buildings or building elements on site); ii. be undertaken by a suitably qualified heritage consultant(s); and iii. include a statement of heritage impact.	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Visual Amenity, Urban Design and Landscaping Any future Development Application shall include an assessment of visual impacts. The assessment shall:		
a. Include a description of the visual significance of the affected landscape;	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Assess the visual impact of the project on the landscape character of the area, including built form (materials and finishes) and the urban design (height, bulk and scale) of key components including container stacking heights, lighting, bridge crossings, and views to and from the project; and	✓	The EIS for the Proposal will be prepared to address this condition of approval.
c. Include details of hard and soft landscaping treatment and design (including proposed road upgrades relevant to that stage and reinstatement of riparian vegetation).	✓	The EIS for the Proposal will be prepared to address this condition of approval.
Biodiversity Any future Development Application shall include a Flora and Fauna assessment. The assessment shall:		
a. Assess impacts on the biodiversity values of the site and adjoining areas, including Endangered Ecological Communities and threatened flora and fauna species and their habitat, impacts on wildlife and habitat corridors, riparian land, and habitat fragmentation and details of mitigation measures, having regard to the range of fauna species and opportunities for connectivity (terrestrial, arboreal and aquatic) across the rail link between the site and the EHPL;	✓	The EIS for the Proposal will be prepared to address this condition of approval, with exception of impact assessment associated with the development of the rail link which was undertaken as part of the SIMTA Stage 1 EIS and is not relevant to this Proposal.
b. Include a Vegetation Management Plan that has been prepared in consultation with the NSW Office of Water;	×	The Proposal is unlikely to impact on relating impacts on riparian vegetation, therefore a preparation of Vegetation Management Plan is considered unnecessary.
c. Document how impacts to the *Persoonia nutans* and the *Grevillea parviflora subsp. Parviflora* flora species have been minimised through the detailed design process;	×	The Proposal is unlikely to impact on *Persoonia nutans and the Grevillea parviflora subsp. Parviflora flora.* As a result the EIS would respond to these Concept Plan Approval Conditions of Approval to the extent that they are relevant to the Proposal.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
d. Include the details of available offset measures to compensate the biodiversity impacts of the proposal where offset measures are proposed to address residual impacts, in particular the following should be considered: i. As stipulated in principle 2 of 'NSW offset principles for major projects (state significant development and infrastructure)', for terrestrial biodiversity, established assessment tools, such as the BioBanking Assessment Methodology (BBAM), are considered best practice; ii. the Biodiversity Offset Strategy will be undertaken in accordance with the 'NSW offset principles for major projects (state significant development and state significant infrastructure)'; and iii. Offsets shall be identified, and demonstrate that they can be secured.	✓	The EIS for the Proposal will be prepared to address this condition of approval if the Biodiversity Assessment to be prepared determines that offset measures are required. .
Section 94 Contributions Any future Development Application shall include:		
a. An assessment of the impacts of the project on local infrastructure, having regard to any relevant Council's Developer Contributions Plan (or equivalent document requiring developer contributions);	✓	The EIS for the Proposal will be prepared to address this condition of approval.
b. Subject to the terms of any applicable Voluntary Planning Agreement, a commitment to pay developer contributions to the relevant consent authority or undertake works-in-kind towards the provision or improvement of public amenities and services. Note: This requirement may be satisfied subject to the terms of any applicable Voluntary Planning Agreement; and	✓	The EIS for the Proposal will be prepared to address this condition of approval, should a Voluntary Planning Agreement be in place at the time.
c. A commitment to undertake vehicle monitoring on Cambridge Avenue in accordance with Traffic and Transport requirement	✓	The EIS for the Proposal will be prepared to address this condition of approval.
d. Should any monitoring reveal the need for improvement works within the Campbelltown LGA as a result of the proposal, the Proponent may be required to contribute towards local road maintenance or upgrades.	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Waste		
Any future Development Application shall ensure that liquid and/or non-liquid waste generated on the site is assessed and classified and where removed from the site, is directed to a waste management facility lawfully permitted to accept the materials.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
Hazards and Risks		
Any future Development Application shall be accompanied by a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the proposal. Should preliminary screening indicate that the proposal is 'potentially hazardous,' a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis (DoP 2011) and Multi-Level Risk Assessment (DoP 2011). The PHA should: a. Estimate the risks from the facility b. Be set in the context of the existing risk profiles for the intermodal facility and demonstrate that the proposal does not increase the overall risk of the area to unacceptable levels; and c. Demonstrate that the proposal complies with the criteria set out in the Hazardous Industry Planning Advisory Paper No. 4 – Risk Criteria for Land Use Safety Planning.	✓	The EIS for the Proposal will be prepared to address this condition of approval.
Freight Village Any future Development Application for the freight village should include:		
a. Employee numbers; b. Details of uses sought; c. Hours of operation for each use; d. Signage; and e. Parking (staff and visitor).	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Condition of Approval	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Bushfire management		
Any future Development Application shall be accompanied by an assessment against Planning for Bushfire 2006 (NSW Rural Fire Service)	✓	The EIS for the Proposal will be prepared to address this condition of approval.
Environmental Risk Analysis		
Notwithstanding the above listed issues, future Development Applications shall include an environmental risk analysis to identify potential environmental impacts associated with the project (construction and operation), proposed mitigation measures and potentially significant residual environmental impacts after the application of proposed mitigation measures. Where additional environmental impacts are identified through this risk analysis, an appropriately detailed impact assessment of the additional environmental impacts shall be included as part of the Development Application.	✓	The EIS for the Proposal will be prepared to address this condition of approval.

Table A-2 SIMTA Concept Plan Conditions of Approval and analysis of relevance to the Proposal

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Development and staging			
The Proponent commits to carrying out the development of the SIMTA Intermodal Terminal Facility generally in accordance with the following plans and documents: • Land Use Plan, prepared by Reid Campbell; and • Indicative Staging Plan, prepared by Reid Campbell.	Throughout construction and operation of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent commits to seeking planning approval for the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line as part of the detailed planning application for the first stage of works. The planning application shall include the following information: • Clear and comprehensive description of the proposed infrastructure and operational details associated with the intermodal terminal; • Detailed assessment of all environmental issues, including geotechnical, ecological, stormwater/flooding and contamination; and • Clear demonstration that the proposed new siding will be compatible with the current and future track alignment, including the proposed quadruplication of the East Hills railway corridor. • Details of consultation with the relevant agencies, including Transport for NSW, Railcorp/Sydney Trains, ARTC, Crown Lands Office, NSW Office of Water, NSW Fisheries and others, as required.	Provide with the planning application for the first stage of works (including the rail link)	×	This commitment is not applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent commits to including the following information with the detailed planning application(s) for the warehouse buildings: • Details of the building massing and internal layouts; • Siting and design of buildings in consideration of potential noise impacts from the intermodal terminal facility; and • Perspective images that clearly show the proposed building treatments.	Provide with the planning application(s) for the warehouse buildings	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent will consider the inclusion of facilities within the Freight Village that meet the needs of employees.	Provide with the planning application(s) for the freight village	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The principles of Crime Prevention Through Environmental Design are to be considered and incorporated into the design.	Provide with the planning applications for the three major stages of the Concept Plan and as required throughout the construction and operation of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Transport and Access			
The Proponent commits to negotiating with the relevant agencies/authorities as required to facilitate the staged delivery of the following road infrastructure upgrades in accordance with the Transport Accessibility Impact Assessment: • Provide a new traffic signal at SIMTA's northern access with Moorebank Avenue;	Prior to exceeding 250,000 TEU terminal (rail side) throughput	×	Not applicable to this stage of the SIMTA Project.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Provide a new traffic signal approximately 750 metres south of SIMTA Central access;	Prior to exceeding 250,000 TEU terminal (rail side) throughput	×	Not applicable to this stage of the SIMTA Project.
• Widen Moorebank Avenue to four lanes between the M5 Motorway/Moorebank Avenue grade separated interchange and the southern SIMTA site access. Some localised improvements will be required around central access and southern access points;	Address within 24 months of operating at 300,000 TEU throughput per annum.	×	Not applicable to this stage of the SIMTA Project
• Concurrent with four lane widening on Moorebank Avenue, the Moorebank Avenue/Anzac Road signal will require some form of widening at the approach roads; and	Address within 24 months of operating at 300,000 TEU throughput per annum	×	Not applicable to this stage of the SIMTA Project.
Potential upgrading works at the M5 Motorway/Moorebank Avenue grade separated interchange to cater for both background and additional SIMTA traffic growth as outlined in Table 9-1 of the Transport Accessibility impact Assessment (and Table 6 of the Environmental Assessment report).	Address within 24 months of operating at 500,000 TEU throughput per annum	×	Not applicable to this stage of the SIMTA Project
The Proponent commits to negotiating with the relevant agencies/authorities as required to facilitate the staged delivery of the public transport infrastructure in accordance with the Transport Accessibility Impact Assessment: • Designing and constructing the central spine road and other site roads to accommodate buses, bus infrastructure and cyclist use for employees.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Construction of a covered bus drop off/pick up facility within the site to encourage the use of buses for employees.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Review and rationalisation of the locations of Route 901 bus stops in the vicinity of the site to match the proposed northern terminal entry location and enhance accessibility.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Providing peak period and SIMTA shift work responsive express buses to/from the site and Liverpool Station via Moorebank Avenue and Newbridge Roads with frequency dependant on the development of the site.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Providing peak period express buses to/from the site and Holsworthy rail station via Anzac Road, Wattle Grove Drive and Heathcote Road with frequency dependant on the development of the site.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Consulting with relevant bus provider(s) regarding the potential to extend the Route 901 bus through the site via the light vehicle road and increasing peak period bus service frequencies to better match the needs of existing and future employees of the locality with frequency dependent on the development of the site.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Consulting with relevant bus providers regarding changes to existing bus stop location and the identification of new bus stop locations if required.	Throughout the detailed planning, construction and operation stages of the SIMTA proposal	✓	This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent shall encourage walking and cycling by the inclusion of appropriate facilities including under cover bike storage, showers and change facilities.	Address in the planning applications for the three major stages of the Concept Plan, where relevant, taking into account employee numbers	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent commits to undertaking an actual truck trip generation survey after 24 months of operation and then progressively as the SIMTA site is developed.	Address after 24 months of commencing operation and within 24 months of operating at an annual throughput of 500,000 TEU and 1,000,000 TEU	×	Not applicable to this stage of the SIMTA Project.
The Proponent commits to developing a Construction Traffic Management Plan to minimise the potential impacts of the construction stage(s), including: • Heavy vehicle access routes; • Location of construction worker parking; • Mitigation measures to avoid any unacceptable impacts on the surrounding land uses; and • Mitigation measures to avoid any unacceptable impacts on regular bus services and school bus services operating on roads within the vicinity of the site and pedestrian and cyclist access.	Prior to construction	✓	This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent commits to developing a Traffic Site Management Plan prior to the commencement of operations at the site to minimise the potential impacts, including: • Management measures to avoid trucks parking and idling either within or outside of the site boundaries; and • Provision of adequate parking for heavy vehicles to accommodate any potential delays in schedule times.	Address prior to commencement of operation for each of the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Noise and Vibration			
The Proponent will undertake further detailed assessments at each application stage after the Concept Plan Approval to provide input to planning and confirm the need for and degree of noise mitigation if required. This should be undertaken based on the most detailed information available at that stage of works. These subsequent assessments should address the DGR requirements for the SIMTA proposal as a minimum.	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent will carry out detailed assessments when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments.	Address within 12 months of commencing operation and within 12 months of operating at an annual throughput of 500,000 TEU and 1,000,000 TEU	×	Not applicable to this stage of the SIMTA Project.
The Proponent shall consider locating buildings at or near the north-eastern and south-eastern boundaries of the site to provide beneficial acoustic shielding to the nearest residences.	Address in the planning applications for the warehouse buildings and/or freight village	✓	This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent shall consider locating less noise-intensive activities and operations at the north-eastern and south-eastern corners of the site where residences are closest.	Address in the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined having regard to the outcomes of the operational noise monitoring.	Address in the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of background noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum.	Provide with the planning applications for the three major stages of the Concept Plan and within 12 months of the commencement of operation for each stage	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Health			

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent will undertake further health impact assessments for lodgement with each of the detailed planning applications for the three major stages of the development, including: • Discussion of the known and potential developments in the local region; • Assessment of the impact on the environmental values of public health; and • Assessment of local and regional impacts including health risks. • Health impact assessments will be undertaken with reference to the Centre for Health Equity Training, Research, and Evaluations' practical guide to impact assessment (August 2007).	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Biodiversity			
The Proponent will undertake further detailed assessment to establish the potential biodiversity impacts of the proposed rail link and measures to mitigate its potential impacts. The investigations shall incorporate the mitigation measures listed within Section 5 of the Flora and Fauna Assessment and as summarised below: <u>Avoid impacts</u> • Site establishment, earthworks and rail construction; <u>Mitigate impacts</u> • Soil disturbance related to site establishment, earthworks and rail construction; • Vegetation clearance for rail construction, access and maintenance tracks; • Construction in riparian areas/in proximity to watercourse; • Construction of pavement, slabs and building structures;	Provide with the planning application for the first stage of works (including the rail link)	×	An assessment of the biodiversity impacts associated with the Rail Link were considered in the Stage 1 EIS. No additional assessment is required as part of the Proposal.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Hot works (including vegetation clearing requiring heat producing equipment); • Alteration to air quality and noise environments; and • Operation of the SIMTA proposal.			
Management of threatened plant species The Proponent shall prepare and implement a Threatened Species Management Plan for the *Persoonia nutans* and *Grevillea parviflora subsp. parviflora* populations within the rail corridor that would be affected by the rail link	Provide with the planning application for the first stage of works (including the rail link)	×	An assessment of the biodiversity impacts associated with the Rail Link were considered in the Stage 1 EIS. No additional assessment is required as part of the Proposal.
Offset impacts The Proponent will update the Preliminary Biodiversity Offset Strategy (Hyder Consulting 2013) in accordance with the NSW offset principles for major projects (state significant development and state significant infrastructure) and continue to consult with the Department of the Environment (DOTE) through the project approval processes. The offset package will be secured before any clearing of endangered ecological communities or threatened species is carried out.	Address within 12 months of the approval of the planning application for the first stage of works (including the rail link) and secure offsets prior to vegetation clearing	✓	The securing of biodiversity offsets is a separate process to the EIS for the Proposal and no additional assessment is required. Biodiversity offsets relating to the Proposal will be discussed and described in the EIS where relevant.
Aquatic flora and fauna The Proponent will implement the following measures to protect the aquatic flora and fauna as part of the applications for the detailed planning applications (where relevant and applicable): • Implementation of design principles for friendly fish passage.	Provide with the planning application for the first stage of works (including the rail link)	×	An assessment of the biodiversity impacts associated with the Rail Link were considered in the Stage 1 EIS. No additional assessment is required as part of the Proposal.
• Implementation of Construction and Operation Management Plans for maintenance of structures in riparian and aquatic zones.	During construction	×	The Proposal would not involve the use of structures in riparian and/or aquatic zones.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Minimise siltation of the Georges River during construction through implementing the water quality mitigation measures detailed within the Stormwater and Flooding section of the Statement of Commitments.	During construction	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Thorough assessment of any development within the Anzac Creek CSWL community, including potential impacts on groundwater quality and quantity.	Provide with the planning applications for the three major stages of the Concept Plan that impact on Anzac Creek	✓	The Proposal has the potential to result in downstream impacts to Anzac Creek. This commitment is applicable to the Proposal and will be considered in the EIS.
• Lantana removal within nominated construction zones to reduce degradation of streamside vegetation and offset any potential impacts to aquatic biodiversity.	During construction	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
<u>Riparian</u> • The proposed rail link (located within the rail corridor) is exempt from the requirement for an a WM Act controlled activity approval from NOW as a transitional Part 3A project; however the detailed design of the rail link will seek to conform to the objects of the WM Act and its associated guidelines.	Provide with the planning application for the first stage of works (including the rail link)	×	An assessment of the biodiversity impacts associated with the Rail Link were considered in the Stage 1 EIS. No additional assessment is required as part of the Proposal.
• The riparian setback for Anzac Creek, as specified by NOW, is 30 metres (20 metre CRZ and 10 metre VB), while for Georges River the riparian setback is likely to be a minimum of 50 metres (40 metre CRZ and 10 metre VB).	Provide with the planning applications for the three major stages of the Concept Plan	✓	The riparian setback will be considered throughout the concept design development of the Proposal, which will be the basis for the EIS. This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Riparian corridors will be appropriately revegetated to restore and/or maintain ecological, functional and habitat values and impede surface flows and drop sediment before it reaches the waterways.	During construction	✓	This will be included as a mitigation measure in the EIS should any impacts to riparian corridors be identified in the environmental assessment for the Proposal. This commitment is applicable to the Proposal and will be considered in the EIS.
• Water quality and quantity issues will be managed during the construction phase through the implementation, inspection and maintenance of best practice soil and water management techniques which will be defined in the CEMP for sedimentation and erosion control during construction.	During construction	✓	Mitigation measures included in the EIS relating to impacts to water quality and quantity will consider this commitment.
• Water quality and quantity issues will be managed during the operation phase through the implementation, inspection and maintenance of Water Sensitive Urban Design (WSUD) measures such as rainwater tanks, grass filter strips, swales and bio retention.	During operation	✓	Mitigation measures included in the EIS relating to impacts to water quality and quantity will consider this commitment.
Hazards and Risks			
<u>Asbestos</u> • The Proponent will develop an asbestos management plan for the SIMTA proposal containing a risk assessment undertaken in accordance with Code of Practice for the Management and Control of Asbestos in the Workplace (NOHSC, 2005). • Where the management plan recommends the removal of asbestos from site all works will be undertaken in accordance with the Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005), including the development of an asbestos removal control plan and an emergency plan.	Prior to demolition and/or construction	✓	Mitigation measures included in the EIS relating to hazards and risks will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Dangerous goods • The Proponent commits to undertaking a preliminary hazard assessment either during the preparation of the subsequent detailed planning applications (where tenants and purposes have been defined) or by tenants during the operational phase of development, as required by State Environmental Planning Policy No. 33 Hazardous and Offensive Development (SEPP No. 33).	Prior to occupation of buildings by tenants proposing to store, handle or transport dangerous goods	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
• Once the level of risk has been identified the aim will be to reduce the risk to 'as low as reasonably possible' (ALARP) through the application of specific operational management procedures that would form part of a framework for managing risks, captured within the facility's Hazard and Risk Management Plan and Emergency Response Plan.	Prior to occupation of buildings by tenants proposing to store, handle or transport dangerous goods	✓	Mitigation measures included in the EIS relating to hazards and risks will consider this commitment.
• Should unacceptable levels of risk be identified during the Preliminary Hazard Assessment (PHA), SIMTA will require potential tenants to demonstrate measures to reduce the risk to an acceptable level prior to acceptance of tenancy.	Prior to occupation of buildings by tenants proposing to store, handle or transport dangerous goods	✓	Mitigation measures included in the EIS relating to hazards and risks will consider this commitment.
• The Proponent will require all tenants to disclose the anticipated type and quantity of goods entering the SIMTA site prior to award of tenancy. Prior to commencement of a lease on the SIMTA site, all tenants that would handle dangerous goods would be required to sign on to SIMTA's Hazard and Risk Management Plan and the Emergency Response Plan for the site.	Prior to occupation of buildings by tenants proposing to store, handle or transport dangerous goods	✓	Mitigation measures included in the EIS relating to hazards and risks will consider this commitment.
• These plans will be reviewed regularly and updated as goods entering the site may change with the tenancies. The requirements in the Code of Practice for storage and handling of dangerous goods (Work Cover NSW, 2005) would be adopted in these plans as a minimum.	Operation	✓	Mitigation measures included in the EIS relating to hazards and risks will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Spills The Proponent commits to the preparation of a Construction and Operational Management Plan prior to the commencement of site operations for control/mitigation and management of any spillage/leaks etc.	Prior to commencement of operation for the first stage of works (including the rail link)	×	Not applicable to this stage of the SIMTA Project.
Unexploded Ordnance The Proponent commits to undertaking and remediation (where necessary) prior to the commencement of construction.	Prior to construction on land potentially affected by UXO	×	There is the potential for unexploded ordnance to be located within bushland area south of the SIMTA Project site, but outside of the Proposal boundary. Remediation relating to UXO is not required for the Proposal.
Bushfire Management The Proponent commits to incorporating the key objectives identified by the Rural Fire Service (RFS) into relevant future design stages, in accordance with the following principles: • Afford occupants of any building adequate protection from exposure to a bush fire. • Ensure safe operational access and egress for emergency service personnel and residents • Provide for ongoing management and maintenance of bush fire protection measures, including fuel loads in asset protection zones (APZs) • Ensure that utility services are adequate to meet the needs of fire fighters.	Address in the planning applications for the three major stages of the Concept Plan	✓	Mitigation measures included in the EIS relating to bushfire will consider this commitment.
The Proponent commits to the development of a Bushfire Management Plan for both the construction and operational phases of the SIMTA proposal that aligns with the requirements of the local RFS Bushfire Management Committee operational plans of management.	Prior to construction of the three major stages of the Concept Plan	✓	Mitigation measures included in the EIS relating to bushfire will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Contamination			
The following tasks will be undertaken in association with the detailed planning applications for the staged redevelopment of the SIMTA site: • Confirming what, if any, actions were taken in regards to the Milsearch (2002) recommendations and the associated low risk ordnance issues;	Provide with the planning applications for the three major stages of the Concept Plan	×	There is the potential for unexploded ordnance to be located within bushland area south of the SIMTA Project site, but outside of the Proposal boundary. Remediation relating to UXO is not required for the Proposal.
• Undertaking further investigations in the areas of environmental concern likely to be impacted upon by the proposed development. These investigations will be based on the detailed design of the proposed development to identify the extent of contamination, and what, if any, remediation activities are needed. The remediation of areas of the site (if any) would be best matched to the development of the site and considered as part of the future design	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Developing a Contamination Management Plan with detailed procedures on: • Handling, stockpiling and assessing potentially contaminated materials encountered during the development works; • Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill; • Assessment, classification and disposal of waste in accordance with relevant legislation; and • A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works.	Prior to construction of the three major stages of the Concept Plan	✓	The Proposal would not include any excavation on the Glenfield Waste Facility. Excavation on the Glenfield Waste Facility was considered in the Stage 1 EIS. No additional assessment is required as part of the Proposal. Mitigation measures included in the EIS relating to contamination will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent will undertake the following tasks in association with the detailed planning applications for the rail link: Undertaking a Phase 2 intrusive environmental site assessment of the proposed rail corridor lands, with an objective to assess the risk posed to the detailed design and construction of the rail corridor by the areas of environmental concern identified within this report. The Phase 2 intrusive investigation would include a program of soil and groundwater sampling completed in accordance with the guidelines made or approved by the EPA under s105 of the Contaminated Land Management Act 1997;	Provide with the planning application for the first stage of works (including the rail link)	×	An assessment of the potential contamination impacts associated with the Rail link were considered in the Stage 1 EIS., including the preparation of a Phase 2 intrusive environmental site assessment. No additional assessment is required as part of the Proposal.
Developing and implementing a contamination management plan as part of the project construction environmental management plan for managing contaminated materials either expected or unexpectedly encountered during the construction of the rail corridor. The contamination management plan would include detailed procedures on: • Handling, stockpiling and assessing potentially contaminated materials encountered during the development works; • Assessment, classification and disposal of waste in accordance with relevant legislation; and • A contingencies plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials that may be encountered during site works	Developed prior to construction of the rail link	×	This commitment was considered as part of the Stage 1 EIS. No additional assessment is required as part of the Proposal.
Stormwater and Flooding			
The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standard outlined in the Stormwater and flooding Environmental Assessment report and including:	Provide with the planning applications for the three major	✓	

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases;	stages of the Concept Plan		This commitment is applicable to the Proposal and will be considered in the EIS.
• Implementation of management plan strategies prior to commencement of the staged construction phase; and	Prior to construction	✓	Mitigation measures included in the EIS relating to stormwater and flooding will consider this commitment.
• Monitoring and review performance of sediment and water control structures during construction and operation phases.	Throughout construction and operation	✓	Mitigation measures included in the EIS relating to stormwater and flooding will consider this commitment.
• The proponent commits to providing a multi-cell culvert (with elevated 'dry' cells and recessed 'wet' cells) to facilitate aquatic and terrestrial fauna movement in accordance with Witheridge (2003) and Part 7 (Division 3) of the Fisheries Management Act 1994 (FM Act).	Provide with the planning application for the first stage of works (including the rail link)	×	This commitment was considered as part of the Stage 1 EIS. No additional assessment is required as part of the Proposal.
• The Proponent will prepare and update a flood emergency response plan as necessary to address the staged development of the site. Details are to be provided prior to the construction of each of the three major stages of the development.	Prior to construction of the three major stages	✓	Mitigation measures included in the EIS relating to stormwater and flooding will consider this commitment.
• The proponent will investigate opportunities to minimise the number of piers located within Georges River during detail design development.	Provide with the planning application for the first stage of works (including the rail link)	×	This commitment was considered as part of the Stage 1 EIS. No additional assessment is required as part of the Proposal.
Air Quality			
The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible	Provide with the planning application for the first stage of	×	A best practice review is not required as part of the Proposal as it relates to warehouse and distribution facilities and

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.	works (including the rail link)		does not include the operation of intermodal terminal facilities. This commitment was considered as part of the Stage 1 EIS.
The Proponent will undertake an air quality monitoring programme during the initial phases of both construction and operation of the SIMTA site in accordance with the Air Quality Impact Assessment and including: • Nuisance Dust • Air Emissions – PM_{10} and Nitrogen dioxide	Within 12 months of commencing operation and within 12 months of operating at an annual throughput of 500,000 TEU and 1,000,000 TEU	×	Not applicable to this stage of the SIMTA Project.
The Proponent shall consider the need to develop a vehicle efficiency and emissions reduction program for the facility to encourage good maintenance and efficient vehicle selection, taking into account the results of the air quality monitoring programme.	Within 12 months of commencing operation and within 12 months of operating at an annual throughput of 500,000 TEU and 1,000,000 TEU	×	Not applicable to this stage of the SIMTA Project.
The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each stage to provide air quality and dust management/ mitigation procedures to be adopted during each of the construction phases of the development.	Prior to construction	✓	Mitigation measures included in the EIS relating to air quality will consider this commitment
The Proponent commits to the preparation of a Greenhouse Gas Management Plan for the three major stages of the development in accordance with the provisions of the Greenhouse Gas Assessment.	Provide with the planning applications for the three major stages of the Concept Plan	✓	Mitigation measures included in the EIS relating to air quality will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Heritage			
Indigenous heritage The Proponent commits to the implementation of the following General Mitigation Measures in the Aboriginal Cultural Heritage Assessment and including: • Consultation between SIMTA and relevant Registered Aboriginal Parties (RAPs) throughout the design and construction of the SIMTA proposal; • Where possible, SIMTA should aim to avoid impacting any known Aboriginal heritage objects, sites or places and places that have potential Aboriginal heritage or cultural values, throughout the life of the SIMTA proposal; • Where impact cannot be avoided, SIMTA should choose partial impact rather than complete impact wherever possible and ensure that appropriate measures to mitigate impacts are developed and implemented as required and as appropriate during design, construction and operation of the various stages of the SIMTA proposal; • If relocation of any element of the SIMTA proposal outside area assessed in this study is proposed, further assessment of the additional area(s) should be undertaken to identify and appropriately manage Aboriginal objects/sites/places that may be in this additional area(s); • In the event that previously undiscovered Aboriginal objects, sites or places (or potential Aboriginal objects, sites or places) are discovered during construction, all works in the vicinity of the find should cease and SIMTA should determine the subsequent course of action in consultation with a heritage professional, relevant Registered Aboriginal Parties and/or the relevant State government agency as appropriate; • Should suspected human skeletal material be identified, all works should cease and the NSW Police and the NSW Coroner's office contacted. Should the burial prove to be	Provide an implementation plan with the planning application for the first stage of works (including the rail link)	✓	This commitment is applicable to the Proposal and will be considered in the EIS. Mitigation measures included in the EIS relating to impacts to Indigenous heritage will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
archaeological of Aboriginal origin, consultation with a heritage professional, relevant RAPs and/or the relevant State government agency, should be undertaken by SIMTA; and • SIMTA should ensure that any reports or documents for the SIMTA proposal concerning Aboriginal heritage comply with applicable statutory requirements (those currently applicable are outlined in this report), are prepared in accordance with best practice professional standards and, where appropriate, ensure findings are provided to OEH AHIMS Registrar and the relevant RAPs.			
The Proponent commits to the implementation of the following Site Specific Mitigation Measures: • To ensure cultural values of land affected by the rail link are appropriately characterised and assessed, Aboriginal consultation should continue to be undertaken in accordance with applicable guidelines and requirements; • Where potentially impacted by the proposed rail link footprint, the artefacts identified in Transect I on the SIMTA site, and Transect 7 immediately south of the SIMTA site, should be collected by RAPs in conjunction with a heritage professional before construction commences. A Care and Control Agreement should be completed between SIMTA and the RAPs regarding the future of the artefacts (it is usually preferred that they be reburied nearby); • Given the extensive historical disturbance within the remainder of the SIMTA site, it is considered that the likelihood of the presence of intact or significant Aboriginal objects and/or sites is low and no further archaeological investigations are warranted in these remaining areas; • In relation to the proposed rail link footprint, with the exception of PADs 1 - 3 (Figure 33), it is considered that the likelihood of the presence of intact or significant Aboriginal	During construction of the first stage of works (including the rail link)	×	This commitment was considered as part of the Stage 1 EIS. No additional assessment is required as part of the Proposal.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
objects and/or sites is low and no further archaeological investigations are warranted in the remaining areas; • Areas within 50 metres of the eastern and western banks of the Georges River, should not be impacted without further assessment; and • The detailed application for the first stage of works shall include test excavations in each of PADs 1 - 3 in accordance with current archaeological practice and any relevant guidelines to determine the nature, extent and significance of any Aboriginal archaeological deposit. Such testing would be undertaken under Section 75U of the Environmental Planning and Assessment Act 1979, and be used to inform the assessment of these areas prior to lodgement of the subsequent staged application. • Where the detailed design of the rail link would result in disturbance to a potential archaeological deposit or an area of potential archaeological value the detailed application for that stage of works shall include test excavations in those areas that may be disturbed in accordance with current archaeological practice and any relevant guidelines to determine the nature, extent and significance of any Aboriginal archaeological deposit. Such testing would be undertaken under Section 75U of the Environmental Planning and Assessment Act 1979, and be used to inform the assessment of these areas prior to lodgement of the subsequent staged application.			

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
Non-indigenous heritage The Proponent commits to undertaking the recommendations within the Non-Indigenous Heritage Report and including: • Preparing a Statement of Heritage Impact (SoHI) for submission to the Minister for Planning and Infrastructure as part of staged planning applications at State level; • Commencing discussions with the appropriate heritage bodies regarding the potential listing of the DNSDC site on the National Heritage List or the State Heritage Register; • Preparing a Statement of Heritage Impact for each stage, including the legal status of the site and advice on required actions depending on whether the site is listed or unlisted at the time that approval is sought; • Development of an overall mitigation strategy for the DNSDC site, which may be based on Table 3 of the Non-Indigenous Heritage report. • Undertaking further archaeological assessment and investigation or monitoring, where required in areas designated as having archaeological potential that would be impacted by the proposal. The SoHIs for each stage should address the archaeological potential within the development area for each stage; and • If any archaeological deposit or item of heritage significance is located within the study area and is at risk of being impacted, the NSW Heritage Council should be notified and a heritage consultant/archaeologist should be engaged to assess the item to determine its heritage significance.	Provide with the planning applications for the three major stages of the Concept Plan as applicable to that stage of the project	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The potential visual impact of the proposed rail corridor shall be mitigated by the use of screening vegetation and terracing or earth mounding to soften the impact of the flyover.	Provide with the planning applications for the three major stages of the Concept Plan as	×	This commitment was considered as part of the Stage 1 EIS. No additional assessment is required as part of the Proposal.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
	applicable to that stage of the project		
Visual and urban design			
The Proponent commits to the preparation and submission of a Landscape Management Plan with the detailed applications for the for the three major stages of the development that address each of the objectives and design principles contained within the Urban Design and Landscape report and the following mitigation measures: • High quality landscaping throughout the site, which will reinforce and extend the surrounding natural context and ecological qualities into the site; • Inclusion of an 18 metre wide corridor of screening vegetation and a bio-retention swale along the Moorebank Avenue frontage, which will utilise a selection of native tree species with dense tree canopy and low screen planting; • Landscape punctuation of nodal points along Moorebank Avenue. • A 'boundary treatment' or 'buffer zone' along the other site boundaries, consisting of existing local species in the area and providing an essential scale of planting to complement the built form, including: – Southern boundary: combination of 10 metre and 20 metre wide landscape corridors and a bio-retention swale adjacent to the warehouse and distribution facilities and Intermodal Terminal. – Eastern boundary: total buffer zone of 13.5 metres consisting of 2.5 metre landscape corridor, a 6 metre	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is largely applicable to the Proposal and will be considered in the EIS. Boundary treatments relating to the Stage 1 Proposal, including the Rail link will not be assessed in the EIS for the Proposal.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
internal light vehicle access road and a five metre wide bioretention swale. – Land cleared for the railway alignment will be include planting consisting of tall trees with a height of 20 metres at Maturity, interspersed with medium height trees.			
• The Proponent will use lighting which is in accordance with Australian Standard A54282-1997 "Control of Obtrusive Effect of Outdoor Lighting'. The height of the permanent light poles will be a maximum of 40 metres and reduced in height, where possible, to minimise potential light spill while maintaining appropriate safety standards.	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
Utilities			
The Proponent will protect and relocate (where required) the existing services passing through the site, including stormwater, sewer, water, telecommunications and electricity.	Prior to/during construction as impacted	✓	Mitigation measures included in the EIS relating to utilities will consider this commitment.
The Proponent will undertake further investigations, as required, and provide details that adequate services are available to the site and/or provide details regarding the proposed servicing upgrades. Details are to be provided with the applications for each of the future stages of the development.	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent will undertake to source all water supplies for the project from an authorised and reliable source.	Prior to construction and operation	✓	Mitigation measures included in the EIS relating to utilities will consider this commitment.
The Proponent will obtain authorisation for the taking of water for purposes other than water supply, including for dewatering during construction.	Prior to construction	✓	Mitigation measures included in the EIS relating to utilities will consider this commitment.
Climate Change Risk			

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
The Proponent will where applicable implement the controls and mitigation measures summarised in the Climate Risk Assessment report and including:	Address within the planning applications for the three major stages		
• Incorporate climate change sensitivity analyses for 20 per cent increase in peak rainfall and storm volumes into flood modelling assessment to determine system performance;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Incorporate appropriate flood mitigation measures, where practical within the design to limit the risk to acceptable levels;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Consider the impacts of climate change on system performance, and where practical incorporate adaptive capacity measures within the design to limit the risk to acceptable levels;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Use of appropriate materials and engineering design capable of withstanding potential impacts posed by storm damage;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Incorporate appropriate strategic protection zones, including asset protection zones into design to limit bushfire risk to acceptable levels, where required;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Control of performance of hotworks on total fire ban days during construction and operation, particularly within any defined asset protection zones;		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
• Maintain track stability through regular maintenance, use concrete sleepers in place of wooden ones and use preventative measures in the event of heatwaves (e.g speed restrictions, warehouse ventilation for improved heat removal); and		×	This mitigation measure was considered in the Stage 1 EIS and is not relevant to the Proposal.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Consider further assessment of Marginal Abatement Cost Curves to assess commercial opportunities of reducing reliance on single energy source.		✓	Mitigation measures included in the EIS relating to climate change risk will consider this commitment.
Ecological Sustainable development			
Where applicable the Proponent will implement the Ecological Sustainable Development initiatives across the construction, operation and decommissioning stages of the SIMTA proposal including: • Site management policies and strategies; • Materials selection and energy and water demand management; and • On-site renewable energy generation.	Provide with the planning applications for the three major stages of the Concept Plan and throughout the project, as required	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The following principles will be achieved during the design development and construction phase of the proposal: • Precautionary principles; • Inter-generational equality; • Conservation of biological and ecological integrity; and • Improved valuation, pricing and incentive mechanisms	During construction	✓	Mitigation measures included in the EIS relating to ecological sustainable development will consider this commitment.
Waste Management			
The Proponent commits to undertaking waste management in the demolition, construction and operational phases of the development as listed below: <u>Demolition</u> • Re-use of material will have priority over recycling; • Recycling will have priority over disposal;	During demolition	✓	Mitigation measures included in the EIS relating to waste management will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Selection of reputable waste removal contractors who will guarantee that recyclable material will be recycled and will provide any relevant certificates; • Vegetation removed shall be either preserved for use in the new development, or mulched for inclusion in landscaping activities. The remainder will be sent to a composting facility; • Excavated earth will be used for infill and landscaping where feasible, the remainder will be sent to a recycling facility; • Asphalt will be re-used by transferring it to a batching plant or using it as a base layer for access roads; • Concrete components will where possible be crushed and reused on site, the remainder will be sent to a recycling facility; • Fuel and oil storage from demolition machinery will be secured and managed responsibly within compound sites during works, and removed upon completion of works; • Sewage waste shall be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements;			

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
<u>Construction</u> • Reduce potential waste by ordering the correct quantities of materials; • Coordinate and sequence trades people to minimise waste; • Prefabricate materials where possible; • Use modular construction and basic designs to reduce the need for off-cuts; • Reuse formwork; • Reuse or recycle materials from the demolition phase; • Separate off-cuts to facilitate reuse, resale or efficient recycling; • Minimise site disturbance and limit unnecessary excavation; • Select landscaping which reduces green waste; • Select waste removal contractors to guarantee that recyclable waste are recycled; • Engage with the supply chain to supply products and materials that use minimal packaging; • Set up schemes with suppliers to take back packaging materials; • Sewage waste shall be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements;	Prior to and during construction	✓	Mitigation measures included in the EIS relating to waste management will consider this commitment.
<u>Operation</u> • Appropriate areas shall be provided for the storage of waste and recyclable material; • Standard signage on how to use the waste management system and what materials are acceptable in the recycling will be posted in all waste collection and storage areas;	Throughout the operation of the SIMTA Proposal	✓	Mitigation measures included in the EIS relating to waste management will consider this commitment.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• All domestic waste shall be collected regularly and disposed of at licensed facilities; • Waste collection vehicles will be able to service the development efficiently and effectively; • An education programme and on-going monitoring will to be implemented for training personnel to properly sort and transport waste into the right components and destinations; • Sewage waste will be disposed of by a licensed waste contractor in accordance with Sydney Water and OEH requirements; and • Trade waste will be discharged to the sewer through a trade waste agreement with Sydney Water.			
Consultation			
The Proponent will continue to consult with relevant government authorities and bodies during the design development process for the detailed applications for the three major stages of the development. Depending on the development proposed, these may include: • Liverpool City Council • Transport for NSW • Railcorp (note: now Sydney Trains) • Australian Rail Track Corporation Ltd (ARTC) • NSW Department of Primary Industries (including NSW • Office of Water, NSW Fisheries and Crown Lands) • NSW Office of Environment and Heritage • Heritage Council of NSW • NSW Environment Protection Authority • Department of Defence	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Department of Finance and Deregulation			
The Proponent will continue to engage and consult with the community during the future detailed planning applications. Depending on the scale of the proposed, development, SIMTA may undertake the following activities either prior to lodgement or during the public exhibition of the application: • Open a Community Information Centre (as appropriate) to provide stakeholders with information and to receive feedback on the proposal • Update the existing project website and maintain access • Continued operation of the email feedback system and free-call information line.	Provide with the planning applications for the three major stages of the Concept Plan	✓	This commitment is applicable to the Proposal and will be considered in the EIS.
The Proponent shall: • Obtain the consent of the ARTC with respect to the connection to the Southern Sydney Freight Line (noting that the granting of consent by ARTC is subject to the provision of ARTC Interstate Access Undertaking); and • Work with ARTC to identify the timing, scope and staging of any required capacity enhancement to the ARTC Network.	Prior to issue of a construction certificate for the rail link construction	×	This commitment was considered as part of the Stage 1 EIS and is not relevant to the Proposal.
Infrastructure delivery[11]			
The proponent commits to entering into a Voluntary Planning Agreement with the relevant authority to facilitate delivery of the following works: • Upgrade of the Moorebank Avenue / M5 Motorway interchange;	Prior to obtaining planning approval for the first stage of works (including the rail link)	×	A modification to the Concept Plan has been sought to remove this SoC and was been lodged with the Stage 1 EIS. The modification and Stage 1 EIS are currently being assessed by NSW DPE.

[11] The deletion of this Statement of Commitment is the subject of the Modification Application (10_0193 MOD1) which is currently in the final stages of assessment by the Planning Assessment Commission (PAC).

Commitment	Timing (as prescribed by the Statement of Commitments)	Relevant to the Proposal? (✓/×)	Justification for inclusion/exclusion as part of EIS
• Upgrade of Moorebank Avenue between Anzac Road and the southern entrance to the site to four lanes; • Provision of a new traffic signal at SIMTA's northern access with Moorebank Avenue; • Provision of a new traffic signal 750 metres south of the central access to the site; • Other parts of the site that will be upgraded, embellished, constructed or dedicated to the Commonwealth, Transport for NSW or the relevant Council that is directly attributable to the carrying out of the proposal; and • Investigating possible changes to the 901 bus route including frequency, stop locations and route. • The timing for the delivery of the works will be in accordance with the agreed timing contained within the relevant Voluntary Planning Agreement.			

APPENDIX B QUANTITY SURVEYORS REPORT

RLB | Rider Levett Bucknall

Rider Levett Bucknall NSW Pty Ltd
ABN 94 003 234 026

Level 19, 141 Walker Street
PO Box 531
North Sydney NSW 2059
Australia

Tel: +61 2 9922 2277
Fax: +61 2 9957 4197
Email: sydney@au.rlb.com

Jf.12252.2.4.SIMTAStage2CIVletter.rjr.rhs

21 April 2016

Tactical Group
Level 15
124 Walker Street
NORTH SYDNEY NSW 2060

Attention: Mr Steve Ryan and Nathan Cairney
Email: sryan@tacticalgroup.com.au ; ncairney@tacticalgroup.com.au

Dear Sir

MOOREBANK INTERMODAL PRECINCT DEVELOPMENT
Development Works on MIPT Land – Stage 2

As requested, we provide below our report on the Capital Investment Value (CIV) for the Stage 2 works project.

Definition

The ***Capital Investment value*** of a development or project includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment other than the following costs:-

(a) Amounts payable, or the cost of land dedicated or any other benefit provided, under a condition imposed under Division 6 or 6A, of Part 4 of the *Environmental Planning and Assessment Act* or a planning agreement under that Division.

(b) Costs relating to any part of the development or project that is the subject of a separate development consent or project approval (such as tenant fit-out)

(c) Land costs (including any costs of marketing and selling land)

(d) GST (as defined by *A New Tax System (Goods and Services Tax) Act 1999* of the Commonwealth).

Basis of Valuation

The estimated Capital Investment Value amounts to $355,650,000 excluding GST, and $391,215,000 including GST. The Estimate breakdown is enclosed for your information.

This estimate includes all costs necessary to establish and operate the project, including the design and construction of buildings, structures, associated infrastructure and fixed or mobile plant and equipment.

In compiling this estimate, no allowance has been made for the following cost items based on advice previously provided by the NSW Department of Planning;

a. Development Application and Construction Certificate fees;

b. Any special or additional contributions sought by authorities for public or other facilities as a condition of development approval;

c. Cost increases beyond April 2016;

d. Finance costs and interest charges.

Job Creation

We estimate that the number of jobs that would be created by this Stage of the development of the site would be:-

a) During construction – approximately 500 construction jobs, and

b) After construction – approximately 900 operational jobs.

Certification

In accordance with the guidelines created and NSW Planning Circular PS 10-008 dated 10 May 2010, we certify that the CIV of $355,650,000 excluding GST is fair and reasonable for the scope of work proposed and based on the preliminary design documentation provided.

Should you require any further assistance, please do not hesitate to contact us.

Yours faithfully

Richard Rigby
Director
Rider Levett Bucknall
richard.rigby@au.rlb.com

DEVELOPMENT WORKS ON MIPT LAND - April 2016

SSD ESTIMATE BASED ON REID CAMPBELL MP-02 - ISSUE C

(Excluding Terminal Stage 1 Works)

Rates current at April 2016 — **TOTAL COST SUMMARY**

Zone	Level	GFA m2	Cost/m2	Current Total Cost $
A	**Site Preparation**			
	Site Preparation			15,256,164
	Demolition			11,228,863
	Allow provisional sum for site remediation			1,010,000
	Allowance for Preliminaries			2,199,603
	Allowance for Margins			1,039,313
	Allowance for Sundry Works			776,057
				$31,510,000
B	**MIPT Land Terminal - Stage 2**			7,485,000
				$7,485,000
C	**Warehousing/ Transport**			
	C1 Warehousing/ Transport 1			12,900,000
	C2 Warehousing/ Transport 2			12,880,000
	C3 Warehousing/ Transport 3			12,880,000
	C4 Warehousing/ Transport 4			12,880,000
	C5 Warehousing/ Transport 5			42,160,000
	C6 Warehousing/ Transport 6			41,915,000
	C7 Warehousing/ Transport 7			42,130,000
	C8 Warehousing/ Transport 8			48,875,000
	C9 Warehousing/ Transport 9			38,595,000
				$265,215,000
D	**Freight Village/ Ancillary Areas**			26,275,000
				$26,275,000
E	**Roads**			5,030,000
				$5,030,000
F	**Other Allowances**			
	F1 Staging & Phasing Costs			Excluded
	F2 Design Fees			20,135,000
				$20,135,000
	Total Cost			**$355,650,000**