Respondent: Department of Finance and Deregulation

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Biodiversity	The Commonwealth is considering using Lot 3001 DP 1125030 as a biodiversity offset. Clearing of this land for the SIMTA rail link will reduce the biodiversity offsetting potential of this land. As part of Project Approval SIMTA is required to consult with the Commonwealth regarding the development of this site.	An assessment of potential cumulative impacts on biodiversity values as a result of development of the MICL project and the SIMTA proposal, based on available information from the MPO Preliminary Environmental Assessment (Parsons Brinckerhoff, 2011) are presented in Section 7.3. The Community Information Boards (MIC 2013) have been reviewed and the information available is consistent with the cumulative impact assessment presented in the EA.	Section 7.3
Water quality	The potential water quality and sedimentation impacts to Anzac Creek and surrounding habitat are of concern. As a result of altered flow regimes from proposed hardstand and stormwater detention systems increased sediment loads in Anzac Creek could be experienced during construction due to altered stormwater flows.	Aquatic fauna surveys identified a low diversity of macroinvertebrates and one native and one exotic fish species from sampling sites in the Georges River and Anzac Creek. Aquatic habitats in both the Georges River and Anzac Creek are considered to be poor quality with dense infestations of weeds reducing habitat by smothering native vegetation. Mitigation measures currently proposed to minimise impacts of construction in riparian areas in proximity to watercourses include installation of appropriate drainage controls and design of rail crossings in accordance with fish passage guidelines. A commitment is included within the statement of commitments to develop and implement a Soil and Water Management Plan during the construction phase of the SIMTA proposal. As described in the EA, this would be developed in accordance with *Managing Urban Stormwater Soils and Construction, Vol. 1* (Landcom 2004)*, 2A and 2D* (DECC). Section 7.3.2.3 of the EA prescribes measures that would be implemented to mitigate impacts throughout construction and operation. The following commitments are contained within the EA: *Water quality and quantity issues will be managed during the construction phase through the implementation, inspection, and*	Sections 7.3.2.3, 10.3.1 and 18 Appendix P: *Flood Study and Stormwater Management* (Hyder Consulting, June 2013g)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		maintenance of best practice soil and water management techniques which be defined in the CEMP for sedimentation and erosion control during construction. *The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standards outlined in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	
Water quality	Proposed hardstand and stormwater detention systems would result in altered flows, including contaminated water, in Anzac Creek during operation. *It is recommended that conditions of approval should include a requirement for water quality controls for construction and operation.*	The following statement of commitment is contained within the EA: *The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standards outlines in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	Section 18 Appendix P: *Flood Study and Stormwater Management* (Hyder Consulting, June 2013g)
Hydrology and	It is unclear how the predicted maximum flood one hour event of	Mapping of the extent of flood impacts to the south of the SIMTA site	Section 10.3.1

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
flooding	0.25 m on Lot 3001 DP 1125930 would be mitigated so that no flood level increase is experienced. *It is recommendation for a condition to require no increase in predicted flood levels on adjacent Commonwealth land.*	is provided in *Appendix P: Flood Study and Stormwater Management*. As the area to the south is largely undeveloped there is little current implication for increased flooding in this area. Civil design drawings showing the proposed location of on site detention and the accompanying report, *Flood and Stormwater Management* (Hyder Consulting, 2013) sets out the methodology used for sizing and siting the on site detention and stormwater conveyance measures. With these measures on site, the Report concludes that the proposed flood impacts of the site operations would be negligible for local developments in anything up to a 100 year ARI, at which point it would be part of a larger systemic issue where the SIMTA sites' surface water flow is not the primary contributing factor to flood heights. It is therefore not considered appropriate for a commitment to be included within the conditions of approval or Statement of Commitments to require no increase in predicted flood levels on adjacent Commonwealth land. The current commitment, as follows, is considered appropriate to mitigate potential flood impacts: *The Proponent will incorporate stormwater quantity and quality management measures into the detailed planning applications in accordance with the objectives and performance standards outlines in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	Appendix P: *Flood Study and Stormwater Management* (Hyder Consulting, June 2013g)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Rail access	The proposed rail corridor through Lot 3001 DP 1125930 has not been accurately defined. Relevant engineering studies should be finalised to allow the Commonwealth to understand impacts.	The precise alignment of the 'rail link' will be determined during the detailed design phase. The construction footprint required width of the for the 'rail link' would be 20 m for the majority of the 3.5 km link, widening to 33 m as the 'rail link' enters the SIMTA site. The proposed 'rail link' footprint assessed in the EIS has been determined, based on current design specifications and requirements prescribed by ARTC and best practice rail design. The impacts associated with construction of the 'rail link' within this proposed easement have been assessed and are presented in the EA. As there is a small chance that the alignment of the 'rail link' may shift slightly during the detailed design process the environmental values of the broader 'rail corridor' area have been discussed within the EA. Further details on the proposed rail link, recommendations and discussions between ARTC and Transport for NSW, and the engineering design parameters that have determined the proposed rail link alignment are presented in the *Rail Access Report* (Hyder Consulting, 2013), included as Appendix H to the EA.	Section 5.3.2.1 Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
Traffic and access	It is unclear how traffic and access arrangements for the SIMTA site will impact users of the SME site, particularly during Stage 1 construction.	Whilst there are currently residencies within the SME area, the Moorebank Units Relocation Project has been approved (19 September 2012) and works on the MUR Project commenced in April 2013. Works associated with the MUR Project include the relocation of the SME site from Moorebank to the nearby Holsworthy Barracks. The timing for construction and delivery of this Project are not publicly available; hence it has not been possible to determine the impacts on the SME site during construction of Stage 1. These impacts would be assessed during the subsequent stages of planning approval, once the timing and works associated with Stage 1 and the MUR Project has been better defined. The *Air Quality Impact Assessment* and *Noise Impact Assessment* reports include discussion of potential impacts on the SME, assuming	Section 6.6 of Appendix Q *Air Quality Impact Assessment (*Pacific Environment, 2013) Section 6.5.2, Appendix I *Noise Impact Assessment – Impact Assessment*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		that the facility remains in place during operation of the SIMTA proposal.	*Report* (Wilkinson Murray, August 2013)
Noise	The current noise assessment of impacts on the SME is inadequate as they fail to acknowledge the residential and educational functions of the site (which will be vacated mid-2015).	A *Noise Impact Assessment* report was prepared by Wilkinson Murray (2013) to provide further detail on the potential noise and vibration impacts associated with the SIMTA proposal. The *Noise Impact Assessment* report contains figures that show the day time and the night time modelled operational noise contours, which clearly show the predicted noise impacts from the proposal on the relocated DNSDC site and the SME / MIC site. The criteria adopted for the assessment of the SME site is the school classroom amenity criteria, prescribed under the Industrial Noise Policy which takes into consideration the educational nature of the facility. The assessment considers both the construction impacts and the operational impacts, in the event that the SME have not relocated from the site by mid-2015, when the first stage of the SIMTA proposal is expected to commence operations.	Section 6.3.1.2 Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise	An assessment of the staged construction and operation of the SIMTA project has not been undertaken. *It is recommended that a condition be applied that all construction works be limited to standard daytime construction hours.*	The *Noise Impact Assessment* assessed the noise impacts associated with construction of the SIMTA proposal. The assessment considered a 'worst case' scenario, whereby construction of all aspects of the proposal would occur concurrently; including construction of the rail link, warehousing and bulk earthworks for the site in its entirety. Additionally, the operational noise impact assessment was based on the site operating at full capacity. It is considered that these assessments are appropriate at the Concept Plan stage and identify the 'worst case scenario' as once the SIMTA proposal commences operation as an intermodal terminal, its operation is expected to be the most dominant feature to the surrounding area, outweighing the impact associated with the construction of future stages. This is due to the terminal operations,	Sections 6.3.1.2, 16 and 18. Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		including the regular arrival and departure of trains, packing and unpacking of these trains using rail mounted gantries, and the movement of goods within the terminal. In addition, the following commitment has been made in the EA: *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.* In addition a Construction Noise and Vibration Management Plan would be prepared and implemented to include the appropriate control measures to avoid, reduce and manage noise emissions and vibration. The following statement has now been included in the EA: *All construction activities will have regard to the standard hours of 07:00 am to 06:00 pm Monday to Friday and 08:00 am to 01:00 pm Saturday (with approval from relevant authorities). Any works undertaken outside of these hours will be undertaken in consultation with relevant authorities. Works outside these hours that may be permitted will include:* ▪ *Any works which do not cause noise emissions to be audible at any nearby sensitive receptors.* ▪ *The delivery of materials which is required outside of these hours as requested by Police or other authorities for safety reasons. Local residents, commercial and industrial premises will be informed of the timing and duration of approved works in accordance with the notification provisions outlined in the CNMP.* ▪ *Emergency work to avoid the loss of lives, property and/or to prevent environmental harm.* ▪ *Any other work as approved through the CNMP Process.*	

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Air quality	It is unclear what air quality impacts will be experienced at the SME during Stage 1 construction and operation scenarios.	Both the DNSDC and SME sites are expected to be vacated prior to full SIMTA operations, however the potential impacts on each site are considered in the event that either site has not vacated. The modelling was undertaken for the 1 million TEU throughput scenario, and therefore represents a 'worst case' estimation for impacts at the SME and relocated DNSDC. The predicted incremental increases in ground-level concentrations at the two sites are comparable in magnitude to the predictions at the residential receptors, and are well below the relevant impact assessment criteria. Based on the cumulative analysis presented in the *Air Quality Impact Assessment* report, it is not expected that air quality goals would be exceeded across either the DNSDC or SME sites. The Draft Statement of Commitments includes the following commitment regarding the management of air quality impacts during construction: *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.*	Section 11.3.3 Section 18 Appendix Q *Air Quality Impact Assessment – Impact Assessment Report* (Pacific Environment, 2013)
Light spill	Light spill impacts on the SME residential dwellings along the west side of Moorebank Avenue have not been specified.	Whilst there are currently residential type receivers within the SME area, the Moorebank Units Relocation Project has received Parliamentary approval and works for the MUR Project have commenced. Works associated with this include the relocation of the SME site from Moorebank to the nearby Holsworthy Barracks. It is not anticipated that there will be dwellings on the site at the commencement of construction of the SIMTA proposal (Parliamentary Secretary for Defence, http://www.minister.defence.gov.au, 2012). An assessment of potential light spill impacts on facilities remaining on the SME site would be undertaken at the appropriate subsequent	Section 13.3.1 and 13.5 and 18

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		stages of planning approval. It is noted in section 13.5 of the EA that: *The light spill assessment has demonstrated that the lighting can be designed to meet the relevant criteria and avoid detrimental impacts on the surrounding area, with opportunities to further reduce the maximum height and associated potential impacts in the detailed design phase.*	
Hydrology and flooding	It is noted that flood levels upstream of the proposed rail link culvert crossing and across Moorebank Ave will increase by 0.1 – 0.2 m, however it is unclear how impacts will be mitigated on SME land. *It is recommended that a condition be applied requiring no increase in predicted flood levels.*	Mapping of the extent of flood impacts is provided in *Appendix P: Flood Study and Stormwater Management*. The TUFLO model results indicate the impacts of the proposed railway and associated culvert would result in negligible flood impacts within the Anzac Creek catchment area in the 100 year average recurrence interval (ARI) event, with a 50% blockage scenario, being only 0.02m. The current commitment, as follows, is considered appropriate to mitigate potential flood impacts: *The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standards outlined in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	Section 10.3.1 Appendix P *Flood Study and Stormwater Management – Transitional Part 3A Concept Plan* (Hyder Consulting, June 2013f)
Hydrology and flooding	The flood impact maps are illegible and need improvement.	The file size was compressed to a size that was readily downloadable and in doing so some of the quality was lost. The *Flood Study and*	Submissions report

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		Stormwater Management appendices that show the mapping and modelling results have been included in the Submissions Report.	
Traffic and access	It is unclear what impact the SIMTA construction traffic will have on access to the DLTP. Need to define the performance of the intersection during construction.	Construction of the SIMTA proposal would be staged, with the timing for completion in part dependent on the staged relocation of the DNSDC. The staging of the full scale SIMTA proposal would minimise the extent of traffic impacts, with construction impacts being short-term and intermittent. Impacts associated with the construction of each stage of development of the SIMTA proposal would be assessed in accordance with the assessment requirements for each stage of planning approval and would address the performance of key intersections during those stages. The following commitment is included within the Draft Statement of Commitments: *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* ▪ *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.*	Section 5.3.1.2 and 18 Appendix F: *Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)
	The DNSDC operation is currently operating under lease until 2018 and no agreement has been reached between the Commonwealth and SIMTA for the site to be vacated.	Section 2.3.1 of the EA notes that the Department of Defence currently holds a lease over the SIMTA site for which it has recently exercised an option that grants permission to occupy the site until 2018. Additional discussions are also included in the Submissions Report. The section also notes that the purpose of the DLTP program is to	Section 2.3.1

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		rationalise and enhance the Defence national logistics network and deliver savings through consolidation of Defence infrastructure. The website for the Moorebank component of the DLTP states: "*In order for the DNSDC to more effectively and efficiently deliver support to the Australian Defence Force, there is a need to consolidate the existing warehousing and maintenance functions at Moorebank. This necessitates a significant investment in new facilities and infrastructure.* *It is not cost-effective for Defence to make a significant infrastructure investment on the leased site. Defence will redevelop the DNSDC on the Commonwealth-owned northern portion of the existing site, and the adjacent property known as West Wattle Grove to the east.*" (http://www.defence.gov.au/jlc/infrastructure/sites/moorebank.html) As parliamentary approval has been granted for the DLTP program and works have commenced on the relocated DNSDC site, which are scheduled for completion in mid-2014, it is contradictory to the aims of the DLTP program for Defence to continue paying for the lease over the SIMTA site once the works for relocation are complete.	
Noise and vibration	Vibration impacts on some DLTP buildings have been identified during the construction phase, however no mitigation measures have been identified. *It is recommended that a condition be applied requiring potential vibration impacts to be managed using best practice management techniques.*	During the construction phases of various stages of the SIMTA proposal, vibration generating equipment may be operated in close proximity to existing buildings on the SIMTA site. The appropriate vibration criterion for these buildings is a limit of 3 mm/s. In order to ensure that construction vibration levels at buildings are within the criterion; the vibratory roller should not be operated within 20 metres of any building. If it is absolutely necessary to operate a vibratory roller within 20 metres of any buildings, vibration levels should be monitored during the operation of the roller. If vibration levels are found to exceed those set out in *Appendix I: Noise Impact Assessment* (Table 5-13), the operation of the vibratory roller should cease and an alternative method for compacting the ground	Section 6.3.1.2 and Section 18 Appendix I *Noise and Vibration Impacts – Impact Assessment Report* (Wilkinson Murray, August 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		near these buildings should be employed. The following commitment is included in the Draft Statement of Commitments and is considered appropriate for the Concept Plan: *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 identify potential noise and vibration impacts and reasonable and feasible noise mitigation measures (such as those identified in this report) that may be implemented to minimise any potential impacts, including engineering and management controls.*	
Air quality	Air quality impacts on the DLTP site during construction have not been identified.	Section 5.1 of the *Air Quality Impact Assessment* outlines the potential air quality impacts associated with the construction phase of the SIMTA proposal, noting that: *Due to the staged nature of SIMTA proposal, construction impacts for the overall Concept Plan are not assessed quantitatively. The air quality impacts from each stage of construction would be assessed and managed separately under the Construction Environmental Management Plan (CEMP) developed at each Stage outlined in Table 5.1.* In addition an Air Quality Management Plan would be prepared and implemented to include appropriate control measures during the construction phase, including control of dust and other particulate emissions.	Sections 11.3.1 and 16 and 18 Appendix Q *Air Quality Impact Assessment – Impact Assessment Report* (Pacific Environment, 2013)
Traffic and access	There is no commitment to road upgrades as part of the proposal. A clear statement regarding road improvements should be included.	The Statement of Commitment includes the following statement: *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:*	Sections 5.3.4.2 and 18 Appendix F: *Transport and Accessibility Impact*

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		▪ *Provide a new traffic signal at SIMTA's northern access with Moorebank Avenue.* ▪ *Provide a new traffic signal approximately 750 metres south of SIMTA Central access.* ▪ *Widen Moorebank Avenue to four lanes between the M5 Motorway/Moorebank Avenue grade separated interchange and the northern SIMTA site access. Some localised improvements will be required around central access and southern access points.* ▪ *Concurrent with four lane widening on Moorebank Avenue, the Moorebank Avenue/Anzac Road signal will require some form of widening at the approach roads.* ▪ *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 and Accessibility Impact Assessment (and Table 6 of the Environmental Assessment Report).*	*Assessment – Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)
	Construction works required to upgrade Moorebank Avenue, a Commonwealth owned roads, has not been included within the scope of the SIMTA EA. The SIMTA EA has not addressed how these works will be undertaken with the proposed SIMTA intermodal project in operation.	Construction works proposed for Moorebank Avenue and Anzac Road and other proposed road network upgrades are identified in Section 8 of the *Transport and Accessibility Impact Assessment* and Section 5.3.4.2 of the EA. Mitigation measure, with maps and sketch plans of the proposed upgrade are provided in *Appendix F: Transport and Accessibility Impact Assessment (Appendix F – Sketch Plan of the Proposed Upgrade)*. The following statement is included within the Draft Statement of Commitments: *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:*	Section 5.3.4 Appendix F – *Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		▪ *Provide a new traffic signal at SIMTA's northern access with Moorebank Avenue.* ▪ *Provide a new traffic signal approximately 750 metres south of SIMTA Central access.* ▪ *Widen Moorebank Avenue to four lanes between the M5 Motorway/Moorebank Avenue grade separated interchange and the northern SIMTA site access. Some localised improvements will be required around central access and southern access points.* ▪ *Concurrent with four lane widening on Moorebank Avenue, the Moorebank Avenue/Anzac Road signal will require some form of widening at the approach roads.* *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 and Accessibility Impact Assessment (and Table 6 of the Environmental Assessment Report).* A statement of mitigation measures, including infrastructure upgrades is included in Section 5.3.4 of the EA, and summarised in Section 16. Upgrades associated with the SIMTA site will occur progressively and will be determined in the subsequent stages of planning approval. SIMTA will remain in consultation with all key stakeholders.	
Traffic and access	The responsibility for the on-going maintenance of Moorebank Ave has not been discussed. *It is recommended that a condition be applied for on-going road maintenance contributions between Defence and SIMTA.*	Road network improvements required to maintain or improve the level of service at intersections impacted by the SIMTA proposal are outlined in Section 8 of the *Traffic and Accessibility Impact Assessment*. Details and schematic drawings of the required upgrades are provided in the impact assessment report. It is noted in Section 5.3 of the EA that these road network upgrades would be discussed and negotiated with RMS and potentially impacted stakeholders. Funding arrangements will be determined in	Section 5.3 Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting,

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		the subsequent stages of planning approval. SIMTA will remain in consultation with all key stakeholders	August 2013a)
	The impact of future SIMTA traffic on the Moorebank Ave and Bapaume Rd intersection has not been assessed. This is required to demonstrate that the intersection does not require upgrading.	Currently Bapaume Rd carries a small volume of traffic. The future traffic volumes on Moorebank Avenue will not adversely impact traffic volumes in and out of Bapaume Road and its intersection operation. Depending on actual development take-up, Moorebank Avenue between SIMTA access and M5 Motor way interchange will be upgraded from two lanes to four lanes. The current access to and from Bapaume Road is likely to be retained when Moorebank Avenue is upgraded.	
	It is unclear how heavy vehicles entering and exiting the SIMTA site will be processed to ensure heavy vehicles do not need to park along Moorebank Ave. This is particularly important for periods of concurrent construction and operation (e.g. during 2017 and 2020). *It is recommended that a condition be applied that traffic is required to enter and exit the site without delay.*	Section 5.3.1 of the EA discusses the traffic impacts of the SIMTA proposal and Section 5.3.4 identifies the strategies to mitigate traffic impacts on the surrounding road network. Section 18 of the EA outlines the proponent's commitment to develop a Traffic Site Management Plan prior to the commencement of operations. This plan will be designed to minimise potential impacts, including: *Management measures to avoid trucks parking and idling either within or outside the site boundaries* *Provision of adequate parking for heavy vehicles to accommodate any* potential delays in schedule times. Subject to subsequent stages of planning approval, a centralised staff car parking area will be provided adjacent to the ancillary facilities on site, enabling the separation of heavy vehicle movements from private vehicle movements, particularly around the intermodal terminal warehouses.	Section s 5.3.1, 5.3.4 and 18
Cumulative Impacts	The approach adopted to assess cumulative impacts of SIMTA and the Commonwealth Moorebank Intermodal Terminal Project is not considered appropriate. The approach adopted by SIMTA whereby	The *Freight Demand Modelling* report and the *Transport and Accessibility Impact Assessment* report have been prepared based on a total freight catchment for intrastate freight, which would be shared	Sections 5.3.4, 6.3.2, 7.3.3, 8.3.4, 9.3.3,

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	the cumulative impact of both projects is assumed to be the same as a SIMTA-only scenario (based on the premise that there is a maximum one million TEU catchment demand for IMEX freight) is not considered to be an appropriate way to assess cumulative impacts, given that: ▪ No assessment has been undertaken that considers the site specific environmental impacts of the combine operation of both intermodals with one million TEU shared between the two. ▪ It appears that no consideration has been given to the spatial layout and infrastructure proposed as part of the Moorebank Intermodal Project, including the various environmental impacts from construction and operation of the components. ▪ It is unclear how environmental impacts from this proposed scenario incorporating the dual site intermodal operation would replicate those of a single site operation. ▪ It is unclear how the stage operation and construction of the SIMTA project has been considered in the cumulative assessment of other developments such as the Moorebank intermodal Project. It is requested that the cumulative scenario proposed by SIMTA, where IMEX TEUs are evenly split across both the SIMTA and the Commonwealth Moorebank intermodal Terminal Project site, be assessed.	between the two intermodal facilities (SIMTA and MICL IMTs), should both developments proceed. TfNSW's submission to the Concept Plan EA (CD 13/21056) notes that TfNSW is satisfied that SIMTA has adequately addressed the intermodal and capacity demands for the intermodal terminal, including the identification of the freight catchment area and freight catchment split. Section 3.3.2 of the EA includes a discussion of the relationship between the MICL proposal and the SIMTA proposal and notes that the intrastate freight catchment identified in the *Freight Demand Modelling* report would be shared between the two proposals. The cumulative impact of the full SIMTA site operations or combined operations with the proposed Moorebank Intermodal Company Ltd (MICL) intermodal proposal has been assessed, taking into account the freight catchment demand of one million TEU for port shuttle freight. The locations of the sources of emissions would change if the demand was shared between the two sites; however, the overall scale of impact would be the same. Cumulative impacts have been considered within specialist studies accordingly, including for Traffic and Access, Noise and Vibration, Air Quality, Flora and Fauna, Rail Access and Freight Demand. Cumulative impacts associated with the SIMTA and MICL proposals have been assessed with the appropriate specialist studies. Section 7 of the *Noise Impact Assessment* outlines the potential cumulative operational noise impacts associated with the two intermodal projects and concluded that the predicted cumulative noise levels at nearby receivers comply with the INP amenity criteria. WMPL has reviewed the information available on the MICL proposal (Community Information Boards, 2013) and considers the cumulative assessment to be indicative of the likely noise emissions from both the SIMTA and MICL sites. The cumulative assessment was made using the best available information regarding the MIICL project. WMPL considers	10.3.2, 11.3.3 and 12.3.3 Appendix G *Freight Demand Modelling – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix F *Transport and Accessibility Impact assessment – Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		an assessment based on amenity criteria to be the most appropriate for cumulative impacts as the amenity criteria are designed to control noise emissions from multiple industrial developments. Amenity based assessments use the LAeq, period noise descriptor which is usually somewhat lower than the LAeq, 15min level for a given source. This can result in the amenity assessment appearing optimistic. Further, some assumptions adopted in the cumulative assessment, such as ignoring the presence of any buildings on the MICL site, will lead to an over-prediction of receiver noise levels. It is therefore concluded that the cumulative assessment represents a 'worst case' scenario. Regional Impacts form cumulative Traffic is assessed in section 6.9 of the *Transport and Accessibility Impact Assessment.* The air quality cumulative impacts associated with the MICL project are included in Section 6.5 of the *Air Quality Impact Assessment.* Findings within these reports is summarised within the EA. A review was undertaken of the information made available on the MICL proposal, and has confirmed that the outcomes from MICL's modelling appear to be largely consistent with the outcomes of SIMTA modelling[1]. The model developed to assess the cumulative impact of both projects is for a combined throughput of 1 million TEU with each Intermodal processing a throughput 500,000 TEU. This approach has been considered appropriate for a Concept Plan application due to the consistency between MICL and SIMTA modelling.	Murray, August 2013) Appendix Q *Air Quality Impact Assessment – Impact Assessment Report* (Pacific Environment, 2013)
Land ownership	Details of SIMTA's acquisition of Commonwealth Government land has not been addressed. It is noted that the EIS does not address the provision of the *Commonwealth Lands Acquisition Act 1989*, which establishes the provisions for the acquisition of Commonwealth land	SIMTA is aware that any approval by the Minister of the SIMTA proposal pursuant to the EP&A Act does not, in the absence of some other property interest or commercial agreement, authorise the carrying out of the approved action on land owned by a third party.	N/A

[1] It is noted that the most recent information made available from the MICL proposal presented different quantities

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	by another party. It would be beneficial to understand how SIMTA intends to obtain an interest in the land.	SIMTA is also aware of the provisions of the *Land Acquisition Act 1989* (Cth) and the Commonwealth Property Disposals Policy – and that there exist various ways in which proprietary rights may be negotiated, agreed and obtained. The manner in which SIMTA seeks to secure any such interests is a commercial matter for SIMTA and the various landowners upon whose land the proposed action may be carried out. This issue is not a relevant consideration for the Minister in the assessment of the SIMTA proposal.	
Staging	It is unclear how the assessment of impacts has accounted for the partial construction and operation scenarios. For example, operation of Stage 1 and construction of Stage 2, operation of Stages 1 and 2 and construction of Stage 3.	Table 2.5.3 of the EA outlines the proposed staging for the SIMTA Moorebank Intermodal Terminal Facility. An illustrative Indicative Staging Plan is provided Appendix D to the EA: *Concept Plan – Land Uses*. The following statement of commitments is included in Section 18 of the EA: *The Proponent commits to carry out the development of the SIMTA Intermodal generally in accordance with the following plans and documents:* ▪ *Land Use Plan, prepared by Reid Campbell.* ▪ *Indicative Staging Plan, prepared by Reid Campbell.* Additional wording on the staging of the SIMTA proposal and anticipated impacts associated with each stage have been included in the Submissions Report.	Sections 2.5.3 and 18.
Noise and vibration	The noise assessment assumes separate timing and scheduling of a number of activities. It is unclear if the assessment has accounted for any potential overlap in scheduling and the resultant noise impacts. *It is recommended that the noise impact assessment be undertaken as part of the project approval.*	The following commitments have been made in the EA: *The Proponent commits to including the following information with the detailed planning application(s) for the warehouse buildings.* *Siting and design of buildings in consideration of potential noise impacts from the intermodal terminal facility.* *The Proponent will undertake further detailed assessments at each*	Section 18

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		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.	