

Respondent: Bankstown Council (James Carey, Manager Sustainable Development)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Cumulative impacts	The proposal does not consider the cumulative capacity of the future Moorebank Intermodal Terminal currently being proposed by the Commonwealth Government. The combined capacity of an estimated 2.2 million TEU per year should underpin the assessment of impacts.	<p>The <i>Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> report have been prepared based on a total freight catchment for intrastate freight, which would be shared 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 <i>Freight Demand Modelling</i> report would be shared between two proposals.</p> <p>The <i>Freight Demand Modelling</i> Report report identifies the catchment demand for statistical local areas (SLA). The SIMTA proposal and the MICL proposal are located within the same SLA, hence the freight catchment would be shared between the two facilities (should both proceed). This is clearly stated in Section 3.3.2 of the EA:</p> <p><i>The SIMTA proposal has been designed to service the freight catchment demand in its entirety, however, it is recognised that the SIMTA proposal may not be the sole facility provided within Moorebank. The Moorebank Intermodal Company Limited (MICL) is also pursuing the development of an intermodal terminal facility on the School of Military Engineering site on the opposite side of Moorebank Avenue. If this proposal is proceeded with, the catchment demand would remain unchanged, however, the anticipated freight needs would be shared between the two facilities.</i></p>	<p>Sections 3.3.2, 3.3.3 and 5.3.4</p> <p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013a)</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>

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Traffic and access	<p>The proposal does not address traffic impacts on the arterial roads, especially Newbridge Rd. The assessment confirms poor performance on certain intersections, but the mitigation measures do not extend past the 'core area'.</p> <p><i>It is recommended that the Department should not support a traffic generating development that exacerbates the existing traffic congestion.</i></p>	<p>The strategic traffic model demonstrates that the proposed M5 West widening would reduce traffic volume on Newbridge Road and Milperra Road. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as M5 Motorway, Hume Highway and M7 Motorway.</p> <p>The <i>Transport and Accessibility Impacts Assessment</i> includes information on the likely impact on the local and regional road networks with, and without the SIMTA proposal. The traffic model outputs reaffirmed that the road network impact from the SIMTA proposal declines with greater distance from the site. The 13 intersections modelled within the report were those within the 'core' and 'inner' areas of close proximity to the site. On most key roads outside the core area, peak hour traffic growth resulting from the development of SIMTA is small with traffic becoming assimilated into existing traffic. Additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as M5 Motorway, Hume Highway and M7 Motorway. Therefore it is not considered likely that intersections outside the core area will be significantly impacted by the SIMTA proposal.</p> <p>It is noted in Section 5.3 of the <i>Transport and Accessibility Impact Assessment</i> Report that future road improvement projects that were used in the base case network were identified from the following key sources, as agreed with the NSW Roads and Maritime Service (RMS):</p> <ul style="list-style-type: none"> ▪ Sydney Strategic Travel Model (STM), Bureau of Transport Statistics (BTS). ▪ M5 West Widening Project, Environmental Assessment, RTA/RMS, September 2010. ▪ M5 West Widening Project, Preferred Project Report, RTA/RMS, 	<p>Section 5.3 and 8</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>

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		<p>May 2011.</p> <ul style="list-style-type: none"> ▪ Infrastructure Statement 2010-2011, RTA/RMS. <p>In 2031, once the upgrades are complete, the background traffic growth means that the delays at the intersections modelled is the same as in 2010.</p> <p>Section 8 of the <i>Transport and Accessibility Impact Assessment</i> outlines potential road and intersection upgrades which would be considered as part of the proposal. Also a Statement of Commitment is included in the EA to confirm the proposals commitment to consideration of road upgrades in the surrounding area (refer to Section 18 of the EA).</p>	
	<p>The proposal may impact the future expansion of the East Hills passenger line due to the utilisation of the passenger railway corridor.</p> <p><i>It is recommended that the Department should not support the development of a development that may diminish future expansion options for the passenger line.</i></p>	<p><i>Rail Access Report</i> has been prepared to provide further information on rail access to and from the SIMTA site and interaction and integration with existing and planned rail infrastructure and services including the proposed Southern Sydney Freight Line (SSFL) and a discussion of future expansionary infrastructure requirements on the SSFL. The report provides concept drawings which accommodate a land allowance for a possible quadruplication of the existing East Hills (passenger) Railway. Appendix B of the <i>Transport and Accessibility Impact Assessment</i> shows concept plan sketches for this scenario.</p> <p>Further, the following Statement of Commitment is included in the EA (refer to Section 18):</p> <p><i>The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed planning application for the first stage of works. The application shall include the following information:</i></p> <ul style="list-style-type: none"> ▪ <i>Clear demonstration that the proposed new siding will be compatible with the current and future track alignment, including</i> 	<p>Sections 5.3.2.3 and 8</p> <p>Appendix H <i>Rail Access Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013b)</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder</p>

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		<p><i>the proposed quadruplication of the East Hills railway corridor.</i></p> <p>Section 2.2 of the <i>Rail Access Report</i> and Section 5.3.2.3 of the EA outline the suitability of the proposed rail alignment and connection to the SSFL. It concludes that the current rail alignment is considered to be a suitable alignment to support a future whole of precinct access arrangement, with the MICL site also being able to access through the same connection point. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. At its peak, the SIMTA proposal will require 21-22 paths. As the SIMTA proposal has the durability to service the entire precinct, the impact on the SSFL would therefore be limited.</p> <p>It was concluded, however that further capacity reviews would be required by ARTC and the project team as the SIMTA proposal progressed to confirm the outcomes of the reporting. Additional infrastructure on the main line may be required. This would be staged depending on ARTC's corridor capacity strategy development that would take into account all users between Port Botany and Moorebank.</p>	Consulting, August 2013a)
	<p>The proposal should assure the prohibition of heavy trucks travelling through designated residential precincts.</p> <p>The Department should designate roads to be utilised for freight movements to minimise traffic and noise impacts on residential areas.</p>	<p>Load limits and road treatments would be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs)) are restricted under the Roads Transport (Mass Loading and Access) Regulation 2005 and the Road Transport (Vehicle Registration) Regulation 2007 from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Trucks, will therefore not access the SIMTA site via residential streets.</p>	N/A

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Council resubmits the attached submissions dated 5 June and 18 October 2012 for further consideration as part of this exhibition			
Cumulative impacts	<p>Council is supportive of the establishment of a network of appropriately located intermodal terminals in Sydney to be connected to Port Botany by way of dedicated freight rail lines, to cater to the continuing rapid growth in container freight through Port Botany.</p> <p>However, Council is of the view that as a precondition of the approval for such facilities the environmental impacts need to be adequately assessed and mitigated and also ensuring that the short, medium and long-term rail and road infrastructure capacity issues have been effectively addressed.</p> <p>As it is now certain that the Commonwealth is going ahead with its proposal for a larger intermodal facility of 1.2 million TEU capacity at the same location on the SME site and that it would like to see development of a freight intermodal hub at Moorebank, the cumulative impacts of these two clustered and significantly large intermodals must be assessed.</p> <p>This is only possible if the two project of a combined capacity of 2.2 million TEU are assessed together and the pros and cons of clustering two significantly large facilities at the same location are objectively assessed by an independent panel.</p>	<p>As noted above, the <i>Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> report have been prepared based on a total freight catchment for intrastate freight, which would be shared 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 <i>Freight Demand Modelling</i> Report identifies the catchment demand for statistical local areas (SLA). The SIMTA proposal and the MICL proposal are located within the same SLA, hence the freight catchment would be shared between the two facilities (should both proceed). This is clearly stated in Section 3.3.2 of the EA:</p> <p><i>The SIMTA proposal has been designed to service the freight catchment demand in its entirety, however, it is recognised that the SIMTA proposal may not be the sole facility provided within Moorebank. The Moorebank Intermodal Company Limited (MICL) is also pursuing the development of an intermodal terminal facility on the School of Military Engineering site on the opposite side of Moorebank Avenue. If this proposal is proceeded with, the catchment demand would remain unchanged, however, the anticipated freight needs would be shared between the two facilities.</i></p> <p>It is our understanding that operation of the MICL site for the purpose of interstate freight movements would not commence until 2028 /2030</p>	<p>Sections 3.3.3 and 5.3.4</p> <p>Appendix F – <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix G <i>Freight Demand Modelling - Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013a)</p>

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		(MICL Information Boards, October 2013 & Detailed Business Case, (KPMG) February 2012) and would be subject to further assessment of market demand. The timeframe identified by MICL for development of interstate freight handling capacity is beyond the future case adopted for the SIMTA proposal.	
Cumulative impacts Traffic Air quality Noise and vibration Health	The City of Bankstown, being an adjacent local government area in close proximity to the proposed site is likely to be impacted by the two proposals, particularly due to the increased heavy freight traffic through its road network, the increased noise and vibration along the rail corridor, the significant potential for air quality impacts on the regional air shed resulting in adverse impact on the health of its community.	<p>Section 5.3 of the EA discusses the traffic impacts of the SIMTA proposal and identifies the strategies to mitigate traffic impacts on the surrounding road network. Section 8 of the <i>Transport and Accessibility Impact Assessment</i> provides further information on the proposed upgrades to the surrounding road network and this report is included in Appendix F to the EA.</p> <p>Section 11.3 of the EA discusses the potential air quality impacts associated with the SIMTA proposal. The <i>Air Quality Impact Assessment</i> includes additional information on the potential air quality impacts associated with the SIMTA proposal. Data generated from dispersion model inputs is included within the report. The methodology in Section 4.1 of the Report includes all assumptions used in the air quality assessment.</p> <p>Section 4 of the report includes details on the existing air quality of the surrounding area. Results, as outlined in Section 6 of the report, have been based on both incremental and cumulative concentrations of pollutants, incorporating the existing concentrations. The assessment concludes that concentrations for NO₂ and 24-hour PM concentrations are lower than the relevant impact assessment criteria. The report concludes that:</p> <p><i>The regional impacts of the SIMTA proposal were determined by comparing its marginal effects on emissions from road vehicles (articulated trucks only) and railway locomotives on the Port-Botany-Moorebank corridor. The assessment shows an overall net reduction in emissions of NO₂ and PM as a result of the SIMTA proposal.</i></p> <p>Section 6.3 of the EA discusses the noise impacts of the SIMTA</p>	<p>Sections 5.3, 6.3, 11.3 and 15.2.</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix Q <i>Air Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)</p> <p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson</p>

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		<p>proposal and identifies the strategies to mitigate noise impacts resulting from the SIMTA proposal. A <i>Noise Impact Assessment</i> report was prepared by Wilkinson Murray to provide further detail on the potential noise and vibration impacts associated with the SIMTA proposal, and are included in Appendix I of the EA.</p> <p>Section 15.2 of the EA discusses health impacts of the SIMTA proposal and identifies strategies to mitigate potential health impacts resulting from the SIMTA proposal.</p> <p>The mitigation strategies identified in the EA would be implemented by SIMTA to ensure that adverse impacts associated with the SIMTA proposal are minimal.</p>	Murray, August 2013)
Traffic	The flow-on effects on Bankstown's arterial road networks are likely to be considerable as some of the roads and intersections are already at or near capacity and experiencing low level of service and congestion.	<p>The strategic traffic model that has been used to assess SIMTA includes the entire Sydney Metropolitan Region. The SIMTA heavy vehicle movements would be primarily redistributed to the west of the M5 Motorway/Moorebank Ave interchange in Liverpool, partly to the South West (from the M5 Motorway via Hume Highway and M7 Motorway) and to the industrial areas in Western Sydney. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as the M5 Motorway, Hume Highway and the M7 Motorway.</p> <p>By transporting freight by rail from Port Botany to the proposed SIMTA Facility the proposal will reduce the number of trucks currently travelling on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site¹, whereas one truck would likely only be able to transport on average, 2 TEU per trip (refer to Section 6.6.2 of <i>Transport and Accessibility Impact Assessment</i>). The resulting reduction in congestion and heavy vehicle movements along the M5 Motorway between Port Botany and Moorebank is expected to be by</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix G <i>Freight Demand Modelling - Transitional Part 3A Concept Plan Application</i> (Hyder</p>

¹ A conservative estimate of 81 TEU per train was used to allow for some redundancy

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		<p>2,700 vehicles per day. SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the current <i>Transport and Accessibility Impact Assessment</i> reflects the outcomes of these discussions.</p> <p>Reduced traffic on the M5 Motorway will likely reduce traffic impacts on Bankstown's arterial roads. Further, no access routes to the SIMTA site would be on Bankstown arterial roads.</p>	Consulting, June 2013a)
Cumulative impacts	There is therefore no evidence in the documents exhibited that the cumulative impacts of the proposal and the Commonwealth's Intermodal proposal as well as other major surrounding projects were taken into consideration at all.	<p>Other development proposals at Federal, state and local level within the vicinity of the SIMTA proposal have been identified in the Submissions Report. The potential for cumulative impacts resulting from the development of these proposals has been included within the specialist studies accordingly.</p> <p>Section 5.3.4 of the EA discusses the relationship of the SIMTA proposal to the adjacent MICL proposal. This section of the EA has included a discussion of the proposed interstate capacity of the MIMT and to clarify that the shared freight catchment serviced by the two intermodal terminals would be based upon the anticipated catchment demand for Port shuttle freight.</p>	Section 5.3.4 Submissions Report
Traffic	The proponent's argument in relation to relieving road congestion simply by transferring a certain volume of freight by rail, which will simply re-introduce and redistribute even greater number of heavy vehicles in the project's catchment to distribute containers or unpacked goods, is unsubstantiated and therefore not tenable. Further analysis of cumulative impacts of these heavy vehicles are essential prior to considering the proposal.	<p>The number of vehicles leaving the SIMTA site has been presented within the <i>Transport and Accessibility Impact Assessment</i> report and the EA.</p> <p>By transporting freight by rail from Port Botany to the proposed Moorebank Intermodal Facility the proposal will reduce the number of trucks currently travelling on the road. One train can transport up to 91 TEU from Port Botany to the proposed facility², whereas one truck would likely only be able to transport on average, 2 TEU per trip. The resulting reduction in congestion and heavy vehicle movements along the M5 Motorway between Port Botany and Moorebank is expected to</p>	Sections 5.3 and 15.3 Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder

² A conservative estimate of 81 TEU per train was used to allow for some redundancy

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		<p>be by 2,700 vehicles per day. SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the current <i>Transport and Accessibility Impact Assessment</i> reflects the outcomes of these discussions.</p> <p>This assessment is considered suitable based on the information currently available for the proposal.</p> <p>Section 5 of the <i>Greenhouse Gas Assessment</i> demonstrates how the Moorebank facility will improve freight transport efficiency within the Moorebank freight catchment. Traffic projections suggest that freight road transport from Port Botany will be reduced by approximately 13 million annual vehicle kilometres as a result of the SIMTA proposal when it is fully operational. The resulting increase in rail transport as a result of the facility is projected to be approximately 332,000 KVT.</p> <p>The report also concludes that the:</p> <p><i>"Use of rail to transport freight from Port Botany through the intermodal terminal to the Moorebank freight catchment can be considered approximately 40 times more efficient than transport by road to the same catchment area. This is due to the efficiencies gained from transporting much larger quantities of freight (81 TEU³) by a single train journey as opposed to a single truck journey (2 TEU)."</i></p>	Consulting, August 2013a)
Traffic Cumulative impacts	The large areas of West and South West Sydney, which is the catchment area for the SIMTA proposal is forecast to experience continued significant increase in future traffic volumes to accommodate higher growth in population, employment and economy. By 2031 population in the major high growth areas to the east M5 corridor is forecast to grow by 108%. This growth would increase background traffic growth higher than all historical growth.	The <i>Transport and Accessibility Impact Assessment</i> assesses concerns over the adopted growth rate. The predicted population growth rate is acknowledged in Section 5.1 of the report. The strategic modelling undertaken predicted peak hour growth in the core study area between 1.7% and 1.9% per annum until 2031. With the proposed M5 West widening the growth on the M5 Motorway is forecast to increase between 2.7% and 3% per annum. The	Appendix G <i>Freight Demand Modelling - Transitional Part 3A Concept Plan Application</i> (Hyder

³ Trains can carry up to 91 TEU. A conservative estimate of 81 TEU per train was used to allow for some redundancy.

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	<p>The assumptions used by the proponent for the future traffic projections do not appear to reflect the future background traffic growth appropriately, particularly, thousands of heavy freight vehicles from Port to South Western Sydney which will still carry containers not carried by rail. More specifically, its modelling did not use the freight traffic to be generated by the relatively larger Commonwealth Moorebank Intermodal to be built next to the SIMTA facility. According to the proponent, the SIMTA development alone is forecast to increase average traffic growth on Moorebank Ave up to 3.1% p.a. Given that the Commonwealth intermodal is of a higher capacity the combined impact is expected to be more than double. This renders the proponent's findings to be deficient and without any sound basis.</p>	<p>Environmental Assessment Report for the proposed M5 West Widening Project indicated that with proposed widening, the growth on M5 Motorway is forecast to increase between 2.5% and 3.1% per annum in the peak directions. The <i>Transport and Accessibility Impact Assessment</i> therefore makes allowance for this growth and includes suitable measures to mitigate the impacts of the proposal.</p> <p>Further, the traffic growth predicted by the strategic model in the SIMTA proposal is in line with growth rates predicted in M5 West Widening project, the figures of which have been accepted by RMS. As noted above, <i>Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> report have been prepared based on a total freight catchment for intrastate freight, which would be shared 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.</p>	<p>Consulting, June 2013a) Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
Traffic	<p>Although the site is hardly serviced by public transport (only one bus service and kilometres away from rail stations) the employee traffic generation rather have been underestimated based on the flawed assumption of the scope to encourage greater public transport share.</p>	<p>The <i>Transport and Accessibility Impact Assessment</i> identified the travel characteristics of SIMTA employees, taking into account the Census data. This included opportunities to target the development of a public transport plan reducing overall trip lengths, travel times and targeting bus services to the site. The assessment concludes that a 30% mode share shift is considered feasible, taking into account the range of infrastructure and non-infrastructure measures proposed to influence and change travel behaviour over the life of the development.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting,</p>

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		<p>Section 8.4.1 of the <i>Traffic and Accessibility Impact Assessment</i> includes a range of initiatives to encourage the use of alternative forms of transport to the private motor vehicle with a sole driver, while recognising the site context and existing/future access to public transport services as the site is developed in a staged manner. It further outlines the potential for additional public transport means, including express bus services between stations, walking and cycleways and extended/additional bus services. These mitigation measures are expected to create a terminal employee public transport mode share of approximately 30%, which is greater than that applying across Liverpool at present. A reduction in the number of car spaces, by 680 spaces, has also been proposed as a means of promoting public transport use.</p> <p>A Statement of Commitment includes the provision of public transport infrastructure for employees travelling to and from the site as follows:</p> <p><i>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.</i></p> <p><i>Providing peak period express buses to/from the site and Holsworthy rail station via Anzac Road, Wattle Grove Drive and Heathcote Road with frequency dependent on the development of the site.</i></p>	August 2013a)
	The proponent has not assessed the potential traffic impact of the proposal outside the immediate 'core area', particularly the wider catchment including adjacent road network in Bankstown likely to have both direct and flow-on impact.	The <i>Transport and Accessibility Impact Assessment</i> includes information on the likely impact on the local and regional road networks with and without the SIMTA proposal. The traffic model outputs reaffirmed that the road network impact from the SIMTA proposal declines with greater distance from the site. The 13 intersections modelled within the report were those within the 'core' and 'inner' areas of close proximity to the site. On most key roads outside the core area, peak hour traffic growth resulting from the development of SIMTA is small with traffic becoming assimilated into	Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting,

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		<p>existing traffic. Additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as M5 Motorway, Hume Highway and M7 Motorway. Therefore it is not considered likely that intersections outside the core area will be significantly impacted by the SIMTA proposal.</p> <p>By transporting freight by rail from Port Botany to the proposed SIMTA Facility the proposal will reduce the number of trucks currently travelling on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site⁴, whereas one truck would likely only be able to transport on average, 2 TEU per trip (refer to Section 6.6.2 of <i>Transport and Accessibility Impact Assessment</i>). The resulting reduction in congestion and heavy vehicle movements along the M5 Motorway between Port Botany and Moorebank is expected to be by 2,700 vehicles per day. SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the current <i>Transport and Accessibility Impact Assessment</i> reflects the outcomes of these discussions.</p> <p>Reduced traffic on the M5 Motorway will likely reduce traffic impacts on Bankstown's arterial roads. Further, no access routes to the SIMTA site would be on Bankstown arterial roads.</p>	August 2013a)
Rail Flooding Ecological	<p>Information and analysis presented by the proponent in the SIMTA proposal documents are deficient, including some uncertainties and inadequate for any objective assessment of the proposal. This is because:</p> <p>There is some confusion regarding the rail services required for the SITMA proposal when fully developed.</p> <p>[It is] mandatory for the proposal to comply with the 2005 FIAB report as an adopted [State] policy document for the NSW Government,</p>	<p><i>Rail Access Report</i> has been prepared to provide further information on rail access to and from the SIMTA site and interaction and integration with existing and planned rail infrastructure and services including the proposed Southern Sydney Freight Line (SSFL) and a discussion of future expansionary infrastructure requirements on the SSFL. The report provides concept drawings which accommodate a land allowance for a possible quadruplication of the existing East Hills (passenger) Railway. Appendix B of the <i>Transport and Accessibility Impact Assessment</i> shows concept plan sketches for this scenario.</p>	<p>Sections 2.3.2, 7.3, 9.3.1.2, 10.3, and 12.3.</p> <p>Appendix H <i>Rail Access Report – Transitional Part 3A Concept Plan Application</i></p>

⁴ A conservative estimate of 81 TEU per train was used to allow for some redundancy

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	<p>which states: <i>Ensure that access to the Moorebank site is delivered in a way that does not compromise the future expansion of the East Hills passenger line.</i></p> <p>The SIMTA proposal may need up to 10 ha of land acquisition in different terrains and ownerships, where no flooding, geotechnical, ecological, contamination assessments have been carried out.</p> <p>Because the railway spur and the SSFL expansionary infrastructure are crucial parts of the proposal, the location, concept designs and landowners commitment and financial arrangement of these works must be addressed in the application to allow proper assessment of the proposal.</p>	<p>The proposal complies with the 2005 FIAB report in that it does not compromise the future expansion of the East Hills Line.</p> <p>Further, the following Statement of Commitment is included in the EA (refer to Section 18):</p> <p><i>The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed planning application for the first stage of works. The application shall include the following information:</i></p> <ul style="list-style-type: none"> ▪ <i>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.</i> <p>Section 2.2 of the <i>Rail Access Report</i> and Section 5.3.2.3 of the EA outline the suitability of the proposed rail alignment and connection to the SSFL. It concludes that the current rail alignment is considered to be a suitable alignment to support a future whole of precinct access arrangement, with the MICL site also being able to access through the same connection point. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. At its peak, the SIMTA proposal will require 21-22 paths. As the SIMTA proposal has the durability to service the entire precinct, the impact on the SSFL would therefore be limited.</p> <p>The EA presents details of the investigations that have been undertaken within the broader 'rail corridor' including Phase 1 contaminated site investigations, stormwater and flooding, biodiversity assessments and Indigenous and non-Indigenous heritage investigations.</p> <p>Initial discussions have also been undertaken with affected landowners surrounding the location and design of the proposal.</p>	<p>(Hyder Consulting, June 2013b)</p>

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		Further, consultation will be undertaken during subsequent stages of planning approval.	
Air quality	<p>The air quality assessment for the proposal as presented in the [Concept Plan Application] document is inadequately scoped, methodologically flawed and therefore the 'findings' remain technically unsubstantiated.</p> <p>The assessment has conveniently overlooked facts, including:</p> <p>A greater number of heavy diesel vehicles will be reintroduced and redistributed in the intermodal's catchment area for carrying containers or goods unpacked at the IMT.</p> <p>The assessment has not included background air pollutants to be emitted along the rail corridor from diesel locomotive rail freight services by others in the future at full corridor capacity utilisation, including the Commonwealth's Moorebank IMT or several other major surrounding projects which received DGRs (see Section 4.1 above).</p> <p>Even when both the IMTs are fully developed at Moorebank by 2031, an extra 5.5 million TEUs will be carried by road freight in Sydney, significantly impacting the background air pollutant level.</p> <p>No assessment has been carried out for emission of fine particulate matter PM2.5 and ultra-fine PM1, which are particularly significant for diesel emissions and are known carcinogenic compounds having significant adverse impacts on human health and respiratory systems.</p> <p>Some air pollutants have not been adequately assessed (ozone, hydrocarbons and other airborne toxics).</p> <p>The proposal completely lacks in operational and other details (e.g. type of locomotives, maximum train and truck idling time etc), without</p>	<p>The <i>Air Quality Impact Assessment</i> includes information on the potential air quality impacts associated with the SIMTA proposal. Data generated from dispersion model inputs is included within the report. The methodology in Section 4.1 of the Report includes all assumptions used in the air quality assessment. The assessment also includes a cumulative impact assessment of the increased traffic on the M5 Motorway and the MICL proposal. The impacts of ozone, hydrocarbons and airborne toxics are considered within <i>the Air Quality Impact Assessment</i>. The emissions factors adopted for the assessment are taken on the National Pollution Inventory (NPI) Emission Estimation Manual for Combustion Engines (Environment Australia, 2003).</p> <p>The number of vehicles leaving the SIMTA site has been presented within the <i>Transport and Accessibility Impact Assessment</i> report and the EA. Within Section 15.3 of the EA it is noted that there will be a:</p> <p><i>Reduction in the volumes of heavy vehicle movements along the M5 corridor in the order of 2,700 movements per day</i> (p. 143)</p> <p>The <i>Air Quality Impact Assessment</i> uses an atmospheric dispersion model, which incorporates the dispersion characteristics of the Liverpool LGA by referencing local observed meteorology measured at Liverpool and Bankstown Airport. Directly measured meteorological parameters (i.e. wind speed, direction) as well as indirect parameters such as stability class are used to characterise and describe the dispersion characteristics of the Liverpool LGA. The predicted impacts from the project take into account the nature of Liverpool LGA, including the influence that local drainage has on dispersion.</p> <p>Section 11.3 of the EA provides a summary of air quality impacts as</p>	<p>Section 15.3</p> <p>Appendix Q <i>Air Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>which any air quality assessment is incomplete).</p> <p>Some emission estimates have been based on assumptions used for the under construction Enfield Intermodal, which cannot be verified or validated, rather than on data from existing and operational IMT in SNW, inter-state or overseas.</p>	<p>well as proposed mitigation measure and the <i>Air Quality Impact Assessment</i> is included as Appendix Q.</p> <p>It is noted that regulations do not currently exist for PM1, or ultra-fine particulates, which are considerably smaller than PM2.5. It is considered that the proportionate deposition of ultra-fine particulates when compared with PM 2.5 would likely be less with the dispersion of these particulates being far greater, based on their smaller size.</p> <p>The information provided within the <i>Air Quality Impact Assessment</i> is considered suitable for approval of the Concept Plan application. The EA includes a number of mitigation measures which will be implemented to minimise impacts on air quality, including additional reporting at subsequent stages of planning approval.</p> <p>The locomotives used to transport freight to the SIMTA site are expected to meet and improve on the US EPA Tier 2 and 3 emissions standards. Unlike traditional locomotives, which have a long shutdown/restart process that provides a dis-incentive to turn the locomotive off, the proposed locomotives will be able to be restarted quickly, reducing idling impacts. As a result, diesel emissions from locomotives on site are expected to be below emissions standards and for brief periods of time.</p> <p>Further, the modelling presented for the assessment of the SIMTA proposal applied assumptions based on the intermodal facility at Enfield. There are no intermodals operating within the Sydney Metropolitan area. The Enfield Intermodal was therefore considered appropriate to assess the operational activities of the SIMTA proposal. In addition, emission factors were taken from the National Pollution Inventory (NPI) Emission Estimation Manual.</p>	
	<p>Meteorological conditions such as annual frequent dust storms and</p>	<p>The <i>Air Quality Impact Assessment</i> uses an atmospheric dispersion</p>	<p>Sections 11.3</p>

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	<p>dispersion capacity of the airshed has been misinterpreted or overestimated and exceedance data have been trivialised or arbitrarily excluded. This has resulted in uncertainty about how regional airshed (such as Bankstown) will be impacted.</p> <p>Council is concerned that the growth in heavy vehicle movement from the intermodal through Newbridge Road, M5, Henry Lawson Drive and Milperra Road will have an adverse impact on local air quality and health of residents in the Bankstown LGA.</p>	<p>model, which incorporates the dispersion characteristics of the Liverpool area by referencing local observed meteorology measured at Liverpool and Bankstown airport. Directly measured meteorological parameters (i.e. wind speed, direction) as well as indirect parameters such as stability class are used to characterise and describe the dispersion characteristics of the Liverpool LGA. The predicted impacts from the proposal take into account the nature of Liverpool LGA, including the influence that local drainage has on dispersion.</p> <p>The <i>Air Quality Impact Assessment</i> Report includes data from 2007 to 2012. The report acknowledges exceedences that occurred in 2009 and notes that they resulted from isolated, regional dust storms.</p> <p>As noted in Section 11.3 of the EA the regional impacts of the SIMTA proposal are expected to result in a net reduction in emissions for NOx, PM and Greenhouse Gases.</p> <p>The number of vehicles leaving the SIMTA site has been presented within the <i>Transport and Accessibility Impact Assessment</i> report and the EA. Within Section 15.3 of the EA it is noted that there will be a:</p> <p><i>Reduction in the volumes of heavy vehicle movements along the M5 corridor in the order of 2,700 movements per day</i> (p. 143)</p> <p>The strategic traffic model demonstrates that the proposed M5 West widening would reduce traffic volume on Newbridge Road and Milperra Road. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as the M5 Motorway, Hume Highway and the M7 Motorway.</p>	<p>and 15.3</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013a)</p>
Noise Impact Assessment	<p><i>“Rail Noise – noise modelling was undertaken based on 42 rail movements per 24 hours spread equally across the day, resulting in 26 movements per day period (7am to 10pm) and 16 movements per night period (10pm to 7pm) along the indicative rail link.” –</i></p>	<p>A <i>Noise Impact Assessment</i> report was prepared by Wilkinson Murray to provide detail on the potential noise and vibration impacts associated with the SIMTA proposal.</p> <p>Assessment of the movements of trains on site was conducted</p>	<p>Section 6.3</p> <p>Appendix I <i>Noise Impact Assessment –</i></p>

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	<p>This clearly shows a lack of consideration of the noise impact from rail movements servicing the adjoining Commonwealth IMT and also background noise levels existing in the rail corridor.</p> <p>That noise impact mitigation along the SSFL corridor can be a significant challenge is evident from the following observations included in the Noise & Vibration Assessment Report for the under construction Southern Sydney Freight Line (Report No. 05032, Wilkinson Murray, April 2006, Executive Summary, p 2).</p> <p><i>“Noise monitoring and calculations undertaken for the assessment indicated that these “planning criteria” are already exceeded at a large number of noise-sensitive locations along the route, due to a combination of passenger and freight movements.”</i></p> <p><i>“some residual exceedances of 3dBA or more are predicted, even with the proposed noise barriers in place.”</i></p> <p><i>“In particular, treatment of individual buildings is not generally considered reasonable due to:</i></p> <p><i>The large number of receivers at which predicted noise level as after barrier treatment still exceed the “planning” noise criteria; and...”</i></p> <p>Therefore, the actual SSFL residual noise impact levels depicted above, even with mitigation measure (such as 4m high noise barriers) proposed demonstrates the lack of any rigour in the SIMTA proposal's noise assessment.</p> <p>There is no evidence that an assessment of the noise impact of heavy vehicle traffic generated by the proposal has been carried out. Some mitigation measures have been talked about the industrial noise resulting from typical plant/equipment and operations inside the SIMTA site only and not based on noise levels that would already be existing from other sources, including the adjoining Commonwealth adjoining Commonwealth intermodal's operation.</p> <p>The noise assessment has been prepared as an inadequate</p>	<p>against the Industrial Noise Policy (INP). The <i>Noise Impact Assessment</i> assessed the worst case 15 minutes operating period, and included four train locomotives operating on site during that 15 minute period.</p> <p>Section 2.3 of the <i>Rail Access Report</i> outlines the expected train turn-around times. At capacity, it is envisaged that 21-22 trains will use the SIMTA terminal each day, spread across the entire 24 hour period. This equates to roughly one train per hour.</p> <p>It is unlikely that a scenario where four trains would be idling on site within a 15 minute period would eventuate, potentially overstating the impact from train locomotives during operation.</p> <p>Section 7 of the <i>Noise Impact Assessment</i> includes an assessment of cumulative impacts of the operation of the SIMTA proposal and the MICL proposal. Strategies and measures which are considered suitable to mitigate noise impacts are identified in the <i>Noise Impact Assessment</i> and Section 6.3 of the EA.</p>	<p><i>Impact assessment Report</i> (Wilkinson Murray, August 2013)</p>

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	<p>preliminary assessment and not a detailed assessment as there is considerable detail that is not included in the report (including impact on sleep disturbance).</p> <p>For both intermodals a more details study for night time rail movements is required in particular.</p>		
Noise impacts in Bankstown	<p>Assuming that the freight trains will travel 40 km/h and approximately 900-1000m long, the high frequency of freight trains will cause continual noise impacts on the communities in Chester Hill and Sefton. SIMTA proposal seems to project freight train movements beyond the scope of SSFL. Whether the nosier mitigation works complete for SSFL is adequate in mitigating impacts from the SIMTA freight movement projection, especially around Chester Hill and Sefton rail corridor.</p>	<p>The SIMTA proposal will involve a shuttle train between the SIMTA site and Port Botany. Noise impacts associated with the operation of the SSFL have been addressed in the planning approval process. SIMTA would be accessing train paths already accounted for within the operation of the SSFL.</p>	N/A
Impact of Obtrusive Outdoor Lighting	<p>The proponent's environmental Assessment does not mention compliance with the relevant Australian Standards for obtrusive lighting, light spill and sky glow. The EA should provide modelling outcome and further advice on how the proposal complies with the <i>AS4282-1997 Control of Obtrusive Effects of Outdoor Lighting</i>, rather than making a mere statement about using suitable light fittings.</p>	<p>It is concluded in Section 13.3.1 of the EA that: <i>'...the impact of spill light to residential properties will be well within the required criteria as specified in Australian Standard AS4282-1997 'Control of the Obtrusive Effect of Outdoor Lighting'.</i></p>	Section 13.3.1
Rail	<p>Since the Concept Plan, the SIMTA proposal includes a revised railway line within the East Hills Passenger Rail Corridor. This is inconsistent with the recommendations of the <i>2005 Freight Infrastructure Advisory Board report (Railing Port Botany's Containers)</i>. The Department of Planning and Infrastructure and Transport for NSW should not consider a proposal that will restrict future expansion of the East Hills Passenger Railway Line.</p>	<p>The <i>Rail Access Report</i> identifies the potential future Moorebank station and the quadruplication of the East Hills Passenger line and provides sketches illustrating how the SIMTA rail link would accommodate these two proposals should they proceed in the future. The report provides concept drawings of accommodating land allowance for possible quadruplication of the existing East Hills Railway. Operation of the passenger service line is the mandate of Sydney Trains (formerly RailCorp) and the need and appropriateness of this infrastructure will be determined by them in the future. The proposal complies with the 2005 FIAB report in that is does not compromise the future expansion of the East Hills Line.</p>	<p>Appendix H <i>Rail Access Report – Transitional Part 3a Concept Plan Application</i> (Hyder Consulting, June 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>Section 2.2 of the <i>Rail Access Report</i> and Section 5.3.2.3 of the EA outline the suitability of the proposed rail alignment and connection to the SSFL. It concludes that the current rail alignment is considered to be a suitable alignment to support a future whole of precinct access arrangement, with the MICL site also being able to access through the same connection point. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. At its peak, the SIMTA proposal will require 21-22 paths. As the SIMTA proposal has the durability to service the entire precinct, the impact on the SSFL would therefore be limited.</p>	
	<p>All environmental studies are based on the combined operation capacity of 1 million TEU capacity, which includes the SIMTA and the Commonwealth Inter Modal Terminal (IMT) proposals. However, the Commonwealth IMT proposal alone is earmarked to operate at 1.2 million TEU capacity. Therefore, the combined capacity is in fact 2.2 million TEU.</p> <p>The Department of Planning & Infrastructure should set a maximum TEU cap for the SIMTA proposal, in the context of the operational capacity of the Commonwealth IMT proposal. Any variation to the maximum TEU capacity should be subject of a separate application and further environmental investigations.</p>	<p>The <i>Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> report have been prepared based on a total freight catchment for intrastate freight, which would be shared 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 <i>Freight Demand Modelling</i> report would be shared between the two proposals.</p> <p>This report identifies the catchment demand for statistical local areas (SLA). The SIMTA proposal and the MICL proposal are located within the same SLA, hence the freight catchment would be shared between the two facilities (should both proceed). This is clearly stated in Section 3.3.2 of the EA:</p> <p><i>The SIMTA proposal has been designed to service the freight</i></p>	<p>Sections 3.3.2 and 5.3.4</p> <p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i>(Hyder Consulting, June 2013a)</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013a)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>catchment demand in its entirety, however, it is recognised that the SIMTA proposal may not be the sole facility provided within Moorebank. The Moorebank Intermodal Company Limited (MICL) is also pursuing the development of an intermodal terminal facility on the School of Military Engineering site on the opposite side of Moorebank Avenue. If this proposal is proceeded with, the catchment demand would remain unchanged, however, the anticipated freight needs would be shared between the two facilities.</i></p> <p>As noted above, it is our understanding that operation of the MICL site for the purpose of interstate freight movements would not commence until 2028 /2030 (MICL Information Boards, October 2013 & Detailed Business Case, (KPMG) February 2012) and would be subject to further assessment of market demand. The timeframe identified by MICL for development of interstate freight handling capacity is beyond the future case adopted for the SIMTA proposal.</p>	
	<p>There is no consideration of the cumulative traffic impacts of the SIMTA and the Commonwealth IMT proposals on the regional road network, especially east of Moorebank. The report response to this concern by broad statement that the number of trucks from Port Botany will reduce as a result of the proposal and that most trucks will serve a catchment west of Moorebank. However the number of trucks movement will be displaced around the SIMTA site and it is plausible that trucks will travel east of Moorebank to avoid toll roads to the west. The displaced trucks may have a greater impact on Newbridge Road, Henry Lawson Drive, and the Hume Highway than anticipated in the current studies.</p> <p>The Department of Planning & Infrastructure should consider the traffic impacts east of Moorebank, especially roads that permit heavy vehicles such as Newbridge Road, Henry Lawson Drive and the Hume Highway. Further, the Department should outline disincentive for the logistics companies to minimise truck freight movements from</p>	<p>The <i>Transport and Accessibility Impact Assessment</i> provides further information on the proposed upgrades to the surrounding road network and further clarify the cumulative scenario. <i>The Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> report have been prepared based on a total freight catchment for intrastate freight, which would be shared 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 strategic traffic model</p>	<p>Section 5.3 Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a) Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	Port Botany to Western Sydney.	<p>demonstrates that the proposed M5 West widening would reduce traffic volume on Newbridge Road and Milperra Road. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as the M5 Motorway, Hume Highway and the M7 Motorway. It is recommended to monitor SIMTA truck traffic on key roads as development progress. This has been outlined in Section 5.3 of the EA. The following Statement of Commitment has been provided in the EA:</p> <p><i>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.</i></p>	<i>Application</i> (Hyder Consulting, June 2013a)