

**Respondent:** Liverpool City Council

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Key Issues <sup>1</sup>	<p>The proposed SIMTA site is owned by the Federal Government, who is also the proponent for the adjacent MIT development. The requirement for the proponent to obtain a waiver from Director-General of DP&amp;I for landowner's consent illustrates that agreement has not been reached as to future leasing or purchasing of the site from the Federal Government. Given that the SIMA and MIT proposal would be competing for capacity the Federal Government would potentially not provide the land to SIMTA, thus preventing the project from going ahead. This presents a key risk to the viability of the project, which is not examined by the 2013 EA.</p> <p><b>Identified as a key issue</b></p>	<p>It is acknowledged 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.</p> <p>It is noted that the purpose of the Defence Logistics Transformation Program (DLTP) is to 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:</p> <p><i>"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."</i></p> <p>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: (<a href="http://www.defence.gov.au/jlc/infrastructure/sites/moorebank.html">http://www.defence.gov.au/jlc/infrastructure/sites/moorebank.html</a>)</p> <p>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</p>	Section 1.1

<sup>1</sup> This section provides a response to the key issues which have not been identified throughout the main comments provided in Section 4 of the Liverpool Council (Aurecon) submission. Other key issues which have not been specifically discussed above are responded to throughout, as indicated below.

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		<p>complete. Available information has been reviewed to confirm the current construction staging for the DNSDC relocation, which is consistent with that presented in the EIS.</p> <p>Additional information regarding the Relocation of DNSDC has been included in the Submissions Report.</p>	

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Rail Provision	<p>The SIMTA and MIT sites both propose to use the SSFL for the transportation of freight as illustrated by Figure 2-1. The 2012 and 2013 EAs contained details of consultation with ARTC in relation to the ability of the SSFL to accommodate the proposed throughput without appropriate investment on expansionary infrastructure including two 750m loops between Leightonfield and Moorebank.</p> <p>The 2013 EA does not include consideration or discussion with ARTC regarding the extent of investment required to accommodate the additional capacity or the capacity of the SIMTA and MIT sites combined. However, ARTC has indicated that the SSFL could potentially accommodate the MIT capacity of 1.7 million TEUs per annum subject to appropriate investment. Detailed modelling is required to ensure that the rail network has the capacity to accommodate the additional freight movements proposed. The modelling would also be able to predict bottlenecks or other interaction issues with commuter or freight trains throughout the rail network.</p> <p>The rail network upgrades identified are not adequately justified by any real network analysis or supporting detail on areas of upgrades required downstream towards the Port and there are limited alternatives outlined. The analysis and outputs of modelling would allow concept designs for any required track modifications to be developed and provide confidence that the proposal can be undertaken without levels of investment that make the entire proposal uneconomic and therefore unfeasible.</p> <p><b>Identified as a key issue</b></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>As noted in the <i>Rail Access Report</i>, operational impacts from the SIMTA proposal will be utilised by ARTC to input into their strategic planning and operational modelling. ARTC's modelling would take into consideration other network users.</p> <p>SIMTA will continue consultation with ARTC in regards to any future expansionary infrastructure. The following statement of commitment is included in the EA:</p> <p><i>The Proponent shall work with ARTC to identify the timing, scope and staging of any required capacity enhancement to the ARTC Network.</i></p> <p>Further, ARTC has provided a submission (20 October 2013) during the most recent exhibition period for the EA, which identifies the ongoing consultation that has been undertaken, and their support for the SIMTA proposal.</p>	<p>Sections 5.3.2.3 and 18</p> <p>Appendix H <i>Rail Access Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013b)</p>
Rail provision	<p>The unwillingness of landowners within the rail corridor to provide consent to the application presents as significant risk to the integrity of the proposal as the rail corridor is an essential component of the</p>	<p>Section 4 of the <i>Rail Access Report</i> outlines the interactions with those stakeholders and landowners that are expected to be affected by the proposed rail spur, including discussions with ARTC, TfNSW</p>	<p>Appendix H <i>Rail Access Report – Transitional Part</i></p>

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	<p>project without which the project would be unviable.</p> <p><b>Identified as a key issue</b></p>	<p>and RailCorp. It is noted that ARTC “<i>has provided no objection to the project definition design</i>”.</p> <p>As identified as a Statement of Commitment (Section 18 of the EA); SIMTA will continue consultation with ARTC in regards to any future expansionary infrastructure.</p> <p>Further, Glenfield Waste Services, another affected landowner has provided detailed support for the proposal (refer to submission, dated 21 October 2013, during the recent exhibition of the EA).</p>	<p>3A Concept Plan Application (Hyder Consulting, June 2013b)</p>
	<p>Two separate connections are proposed from the SIMTA and MIT sites to the SSFL, as illustrated in Figure 2-1. The provision of two rail spurs from adjacent site requires extensive duplication of rail infrastructure including track work and signalization, which is both resource and land use intensive, with extensive areas of vegetation required to be cleared, particularly for the SIMTA proposal.</p> <p>A more appropriate solution would be for the SIMTA site to access the SSFL via the MIT site, with only one direct spur from the SSFL. This option would potentially have a lesser impact on the efficiency of the SSFL with less signalisation and associated network management required. Alternatively, there is an existing spur line and associated rail corridor branching off the East Hills line to the south of the site. While upgrades to this spur line are likely to be required this would reduce resource consumption and the requirement for the extensive clearing on Commonwealth listed native vegetation, providing a more sustainable scheme.</p> <p>In addition to rail, there are numerous other duplications and losses of economies of scale resulting from the proposed location of two standalone projects on immediately adjacent sites.</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 and would not require the provision of two rail spurs.</p> <p>The alignment of the rail spur on the land to the south of the SIMTA site is designed for 35 kph speed with a minimum horizontal curve radius of 200 metres. The alignment has been determined based on current design specifications and requirements prescribed by ARTC.</p> <p>Relocation of the rail link to the east of the SIMTA site would result in a lesser impact to individual flora species (<i>Persoonia nutans</i> and <i>Grevillea parviflora subsp. Parviflora</i>) within the rail corridor; however, it would result in rail, freight handling and truck</p>	<p>Section 5.3.2.3</p> <p>Appendix H <i>Rail Access Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013b)</p>

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	<b>Identified as a key issue</b>	movements occurring closer to the residences at Wattle Grove and Moorebank, with reduced opportunities for constructed warehouses to effectively attenuate noise and air emissions generated by the terminal operations, or provide visual screening of the operation. It would also pose a safety hazard to the site by reducing the separation between truck container transfer points and warehouse container storage areas.	
State statutory review:  ISEPP	The rail alignment is located within the SP2 Infrastructure (Defence) and RE1 Public Recreation zones. Subject to Clause 81 of ISEPP development of rail infrastructure facilities is permitted with consent in 'prescribed zones'. The SP2 zone is a prescribed zone. However, the RE1 zone is not. Consequently, ISEPP cannot be used to obtain permissibility for the proposed rail corridor. Therefore, permissibility is required to be obtained subject to the now repealed Section 75O(3) and Section 75R of the EP&A Act.	The proposed works within the land zoned RE1 Recreation is permitted in accordance with the Transitional Part 3A provisions. The Minister may (but is not required to) take into account the provisions of any environmental planning instruments (other than state environmental planning policies) in determining a Concept Plan. The land is not considered to be an 'environmentally sensitive area of State significance' having regard to the significant disturbance of the site during its use for extractive industry and landfill. The site is also not appropriately defined as a 'sensitive coastal location'. Accordingly, the Minister may approve the proposed works, irrespective of the provisions of the Liverpool LEP.	Section 2.42 of EA
Local statutory review:  Liverpool LEP 2008	The proposed scale of development is well in excess of that envisaged by the strategic planning for the site, with the prescribed maximum building height of 15m being exceeded by a number of structures within the proposal. The height of structures should be reduced where possible to minimise the visual dominance of the proposal and comply with the maximum building height requirements. Where the proposal exceeds 15m in height an application to vary the development standard must be submitted to Council for consideration, with concurrence provided by DP&I. Where the variation is not deemed acceptable by Council the proposed scheme should be revised.	Section 75O(3) of the now repealed Part 3A provisions state that the Minister may (but is not required to) take into account the provisions of any environmental planning instruments (other than state environmental planning policies, however, the potential amenity impacts arising from the proposal are required to be addressed in accordance with the provisions of the DGRs. A comprehensive Visual Analysis has been prepared by Reid Campbell which assesses the appropriateness of the proposal, including the potential impacts arising from the proposed buildings and equipment. The proposed development is considered acceptable, having regard to the potential visual impacts of the proposal.	Section 2.4.7 and Section 13 of EA

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Local statutory review:  Liverpool LEP 2008	The visual assessment prepared in support of the proposal is based on a high level concept that does not include massing diagrams or building envelopes and is therefore generic, lacking a review of the actual development proposed. Consequently, the visual assessment is considered inadequate and not fit for purpose.	The visual impact assessment is considered entirely appropriate for a Concept Plan, including a comprehensive assessment of the existing environment, the potential visual impacts of the SIMTA proposal and the potential cumulative impacts of the SIMTA and MICL proposals. Further consideration will be given to the siting and layout of the development in the preparation of the detailed applications for the future stages, including provision of perspective images.	Section 13 of EA
Local statutory review:  Development Control Plan – Moorebank International Technology Park	Insufficient information is provided to allow any assessment of the site layout and design in the context of the Liverpool DCP Part 2.4 requirements, which relates specifically to the subject site. Comprehensive site layout and design plans are required to allow consideration of the proposal.	The Land Use Plan and Indicative Staging Plan provide sufficient detail for a Concept Plan. Further consideration will be given to the siting and layout of the development in the preparation of the detailed applications for the future stages.	Section 2.5 of EA
Traffic and Transport	Additional modelling was undertaken on Moorebank Avenue between Helles Avenue and High Lane which indicated that the Level of Service of the modelled intersections would not drastically be impacted by the SIMTA development as the intersections would be operating at an existing unacceptable level of service. As intersection performance summary tables have not been provided, the impact the SIMTA development would have on the surrounding road network cannot be accurately substantiated.	<p>The <i>Transport and Accessibility Impact Assessment</i> includes additional information on the potential impacts on the surrounding road network associated with the SIMTA proposal.</p> <p>Table 3-8 and 3-9 provide an existing (2010) performance summary table for three intersections on Moorebank Avenue between Helles Avenue and High Lane in the AM and PM peaks respectively.</p> <p>Section 6.10.3 of the report assesses the impacts on Moorebank avenue between Helles Avenue and High Lane as a result of the SIMTA proposal in 2031. The AM peak and PM peak LoS at each of three intersections is summarised in Tables 6-8 and 6-9 respectively. This summary includes the LoS with and without the SIMTA proposal in 2031. This information provided is considered suitable to accurately determine the impact of the proposal on the</p>	Section 5.3  Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)

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		surrounding road network.	
	It is unclear whether the worse Level of Service experienced for the base case intersection modelling in the 'without SIMTA case' is as a result of the unreleased trips from the Paramics network modelling, as clarification in regards to updates made to the network model is not provided.	The <i>Transport and Accessibility Impact Assessment</i> includes information on the road networks used in the model analysis. The modelling results and data included within the <i>Transport and Accessibility Impact Assessment</i> should be adequate for any assessment requirements. Additionally clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.	Section 5.3  Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)
	<p>Despite further information in regards to the traffic distribution based on heavy vehicle type, the basis for the estimation of the 2031 traffic flows is still unclear and provides no further clarification in regards to justifying the impacts of the traffic generated by SIMTA. Clarification is still not provided in regards to what factors were used to determine the forecast 2031 traffic volumes. For example, the proposed MIT facility also to be located in Moorebank is not included in the traffic model. Although requested in the TfNSW submission CD12/05199, point 6.1, employee trip generations calculated do not include the employee trips from both the SIMTA and MIT proposals.</p> <p><i>The following are recommended:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Inclusion in traffic modelling and/ or sensitivity testing of concurrent developments in the Moorebank precinct including the Commonwealth MIT site, Goodman Fielder Bakery facility and the 500,000MT construction waste recycling facility.</i></li> <li>▪ <i>In accordance with TfNSW submission CD12/05199, point 6.1,</i></li> </ul>	<p>The <i>Transport and Accessibility Impact Assessment</i> has assumed 2031 as the future horizon year for its assessment. The traffic model used assumptions available at the time of undertaking/preparing the report. The 2031 traffic flows are based on population and employment forecasts from NSW Governments prediction sourced from Bureau of Transport Statistics (BTS). The BTS forecast included growth projections based on the Sydney Airport Master Plan and Port Botany. Truck forecasts for Port Botany were aligned with the NSW Ports forecast.</p> <p>Hyder's traffic model analysis took into account the higher order road network changes proposed by the RMS (M5 Motorway widening) as well as the proposed 1 million TEU intermodal terminal capacity identified for the entire Moorebank catchment. The proposed widening of M5 South-West Motorway and other higher order roads between now and 2031 will result in traffic growth and further traffic redistribution across the network. Any future proposal by the Moorebank Intermodal Company Limited (MICL), formerly</p>	Section 5.3  Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)

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	<p><i>employee trip generations calculated should include the employee trips generated from both the SIMTA and MIT with the modelling incorporating all trips generated.</i></p> <ul style="list-style-type: none"> <li>▪ <i>In accordance with TfNSW submission CD12/05199, point 6.2, clarification of traffic assignments needs to be provided and incorporated into traffic assessments, modelling both the Intermodal Terminal Facilities.</i></li> </ul>	<p>known as the Moorebank Project Office (MPO) is expected to service the similar catchment area reducing the ability for the SIMTA to achieve full operational capacity.</p> <p>The additional traffic impact from the proposed redevelopment of the Goodman Fielder Bakery Facility and the new construction waste facility on Newbridge Road have been incorporated using an average growth rate on the targeted roads in and around Moorebank of approximately 1.6-1.8% per annum. This rate of growth would account for potential traffic generated as a result of these planned new developments.</p> <p>The report has addressed issues raised by TfNSW and RMS and a compliance table is shown in Table 10.2 of the <i>Transport and Accessibility Impact Assessment</i>.</p> <p>In a summary the SIMTA proposal has been designed to service the entire freight catchment, with a throughput capacity of one million TEU per annum. The assessment considers cumulative impacts of the SIMTA proposal in the event that it proceeded concurrently with the MPO will result in substantially the same traffic impacts.</p>	
	<p>Despite some plans being provided for the site accesses and M5 access points, only general comments were provided about the 2011 or 2031 road networks used in the transport models, specifically in the Liverpool LGA. As a result, the impact of future car and truck traffic on Council's local and regional road cannot be confirmed.</p> <p><i>It is recommended that the assessment should consider the impact of the proposal on access to the Liverpool City Centre as a Regional City, with any worsening of impacts considered unjustifiable.</i></p>	<p>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 existing traffic. Additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as M5</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting,</p>



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		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.	August 2013a)
	<p>The revised EA indicates that upgrades are required to the road network, highlighting that the infrastructure will need to be developed progressively over the next 20 years to cater for the forecast increase in traffic volumes which will result from both the SIMTA development and the general growth in traffic passing through the area. Recommendations in regards to upgrades to infrastructure are identified as widening Moorebank Avenue to four lanes, widening of the approach at Moorebank Avenue/Anzac Road signalised intersection, new traffic signals at SIMTA's northern and southern access point on Moorebank Avenue, SIMTA's central access being retained as SIMTA access and upgrades at the M5/Moorebank Avenue grade separated interchange to cater for growth in traffic volumes. Testing was undertaken with the incorporation of upgrades to infrastructure mentioned with assessment being undertaken at the access points and the intersections of Moorebank Avenue/Anzac Road and M5 Motorway/Moorebank Avenue. The infrastructure upgrade highlighted improved Level of Service. No comment was provided in relation to the traffic impacts on the intersections outside of the core area and any infrastructure upgrades that may be required.</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>Potential road upgrades have been identified for intersections that are likely to be impacted as a result of the SIMTA proposal.</p>	<p>Section 5.3</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>Intersection summary results have not been fully provided for all the intersections assessed to support the stated Levels of Service. As a result, it is difficult to confirm the impact of the SIMTA development on the assessed intersections.</p>	<p>The <i>Transport and Accessibility Impact Assessment</i> includes information on the road networks used in the model analysis. The modelling results and data included within the <i>Transport and Accessibility Impact Assessment</i> should be adequate for any assessment requirements. Additionally clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i></p>

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			(Hyder Consulting, August 2013a)
	<p>The higher trip generation rates determined in the Aurecon report highlights that the potential trip generation could be double of that identified within the revised EA, with the report recommending that the actual trip generation rate be surveyed after 24 months of the SIMTA site opening. The potential increase in actual trips generated from the SIMTA development may result in large queues and lengthy delays if the full development is approved and the Aurecon trip generation rates prove correct. The sensitivity test carried out did not provide details of impacts beyond the M5 interchange, or identify measures to resolve the unacceptable intersection performance in the 2031 scenario. The sensitivity test only examined one set of variables, and there are several other variables, explained in further detail below, which may also impact on the trip generation. Without confidence of the possible trip generation beyond 24 months of operation, the consent authority may find it appropriate to only approve the first stage of development until development scaling beyond 24 months operation can be confirmed.</p> <p><i>It is recommended that sensitivity testing of the numerous assumptions that may lead to a worse traffic outcome, rather than a cursory review of assumptions which may result in more favourable outcomes. Provision of the modelled traffic impacts that may result from a robust sensitivity assessment is carried out.</i></p>	<p>It is noted that there is a significant difference in the assumed container movement and distribution between the Aurecon report and the <i>Transport and Accessibility Impact Assessment</i>. It is noted in Section 8.2 of the <i>Transport and Accessibility Impact Assessment</i> that:</p> <p><i>The Aurecon study assumes a mix of “domestic and maritime” rail movements, while SIMTA considered a port-shuttle freight rail service to and from Port Botany.</i></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. Section 8.2 of the <i>Transport and Accessibility Impact Assessment</i>. outlines the sensitivity analysis provided based on Aurecon’s Trip Generation. Further sensitivity analysis to assess the impact of changing container size, vehicle utilisation and employee totals was also undertaken, and is detailed in Section 6.6 of the TIA.</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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		An actual truck trip generation survey from SIMTA site would be undertaken after 24 months of operation of the terminal as identified in the Statement of Commitments (refer to Section 18 of the EA).	
	<p>The revised EA highlights the results in 2031 with and without SIMTA and suggests that SIMTA will not be the cause of the failure at these intersections as the intersections will have already failed. The revised report has provided clarification in regards to the staging of the SIMTA development, providing the anticipated TEU thresholds at various stages and corresponding upgrades to the road network. However, traffic modelling at intermediate years to show the impact of SIMTA as the project ramps up from 2015 to 2025 is required to determine the confirm how much sooner the intersections would fail as a result of the SIMTA project, and at what years.</p> <p><i>It is recommended that traffic modelling should be undertaken for intervening years to show the impact of the intermodal traffic as either / or the SIMTA and MIT intermodal sites ramp up from 2015 to 2031.</i></p>	<p>The <i>Transport and Accessibility Impact Assessment</i> notes that by 2031, the future horizon for its assessment, it is expected that planned population and employment growth in the Liverpool Local Government Area (LGA) and South-West Subregion will impact traffic operations of key roads and intersections in the M5 Motorway corridor, presenting a 'worst-case' traffic scenario. A Traffic Management Site Plan will be established prior to the initial operation of the Project and will include outlined procedures for undertaking improvements to the road network as identified in the Statement of Commitments (refer to Section 18 of the EA).</p> <p>The <i>Transport and Accessibility Impact Assessment</i> has incorporated expected changes in population growth rates in years – 2016, 2026 and 2031 (Section 5.1). As noted above, improvements of critical intersections would depend on a number of factors, predominantly the rate of development within the SIMTA site. Therefore intersection upgrades will be carried out in a staged approach determined by the level and rate of development.</p>	<p>Section 5.3</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>There is no traffic flow data from the traffic models to confirm that the recommended upgrades proposed at the impacted intersections would resolve the issues. Further, there is no commitment as to who would be responsible for the cost of these upgrades.</p> <p><i>It is recommended that the proponent makes available the AM and PM peak hour traffic flow results produced by the transport models on all roads within the Liverpool LGA included in the model. The Modelled results should clearly distinguish traffic flows without either intermodal terminal and with one or the other or both intermodal sites.</i></p>	<p>The <i>Transport and Accessibility Impact Assessment</i> includes information on the road networks used in the model analysis. The modelling results and data included within the <i>Transport and Accessibility Impact Assessment</i> should be adequate for any assessment requirements. Additionally clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.</p> <p>A <i>Transport and Accessibility Impact Assessment</i> has been produced by Hyder (August 2013a). A Traffic Management Plan will</p>	<p>Section 5.3</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 traffic flow results must clearly show the car and truck movements generated by the intermodal sites on Council Roads.</i></p>	<p>be prepared prior to operation of the SIMTA development as identified in the Statement of Commitments (refer to Section 18 of the EA). The report also includes additional mitigation measures to reduce the risks associated with transport and access. Notably, the proposed infrastructure upgrades will “<i>deliver adequate capacity to the road network</i>”. In addition the mitigation measures proposed to promote public transport will help achieve an employee public transport mode share shift of approximately 30%. This will further mitigate the risks associated with traffic and access.</p> <p>Funding arrangements will be determined in the detailed application for future stages. As upgrades associated with the SIMTA site, are to occur progressively, it is premature to establish funding arrangements. However SIMTA will remain in consultation with all impacted stakeholders. SIMTA is committed to providing the necessary infrastructure upgrades as is reasonable based on delivery of the proposal.</p>	<p>Consulting, August 2013a)</p>
	<p>The statement regarding the lack of information in regards to the SME site not being available was deleted from the revised report. It is unclear whether the data that is available has been incorporated within the revised report.</p>	<p>Section 5.7 and 6.9 of the <i>Transport and Accessibility Impact Assessment</i> has previously incorporated impact from SME site including the traffic associated with the Defence’s proposed West Wattle Grove site.</p>	<p>Section 5.3  Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p><b>Trip Generation</b></p>	<p>The <i>Transport and Accessibility Impact Assessment</i> includes information on traffic modelling and trip generation data. Section 6.5</p>	<p>Appendix F <i>Transport and</i></p>

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	<p>The traffic results reflected in the traffic modelling, and other modelling such as air quality and noise, are highly dependent on the trip generation assumptions. Some of the assumptions are very broad, not backed by research or assessment, and may have the ability to skew the trip generation results by a very significant proportion. The flow on impact of an error in trip generation estimates onto traffic network performance would be of even greater magnitude.</p>	<p>of the report outlines the validation of truck trip generation modelled. Section 6.6 of the report discusses Sensitivity Testing carried out around key assumptions.</p> <p>Furthermore, a <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><i>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>
	<p>The projected daily workforce of approximately 2,258 staff, with approximately 2,638 daily truck trips of would appear to be potentially illogical. The productivity of each person onsite would equate to the generation of approximately one truck trip each day and this ratio appears to be low and not representative of a commercially viable operation. An obvious conclusion is that the number of daily truck trips may be significantly under estimated for the intended size of the facility.</p> <p><i>It is recommended that details are provided to justify the commercially illogically low level of truck trips currently indicated which shows that each person working at the site per day results in the generation of approximately one truck trip.</i></p>	<p>As noted, the SIMTA facility is expected to accommodate about 2,258 employees on site at full operation of the development. The majority of staff will work in the warehouses and distribution centres unpacking containers or preparing the contents for distribution. It is expected that these workers will operate in two shifts over part of the day, as will support and administrative staff. Some office and ancillary staff, as well as retail operators, will work during normal working hours.</p> <p>Therefore, the truck numbers are an adequate and logical representation of the operational requirements of the proposal.</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>The trip generation estimate contends that container contents packed or unpacked at the intermodal facility are transported to and from the warehouses in full truck loads, where the arriving or departing vehicle is loaded to its axle limit. This assumption is highly unlikely to be achieved in practice due to the many different origins and destinations of goods which may be carried in multi-source containers. Although some containers may be single source/ origin, a large percentage of containers being unpacked at the terminal would be multi-source. One of the primary benefits of having a container packed or unpacked at the terminal is the ability to multi-load the contents of the container, as it is not unusual for the costs to have a single source container packed at the terminal far exceed the transport costs associated with having the container brought to a single customer. The fact that some truck trips bringing or taking freight will be loaded less than 100% full has not been reflected in the trip generation estimate and no weighting for less than fully loaded truck trips has been accounted for. Consequently, the actual number of truck movements is anticipated to be greater than that considered in the EA.</p> <p><i>It is recommended that the proponent provides a justification or comparative analysis to show that delivery vehicles for warehousing will always be arriving and departing fully loaded, or alternatively application of a factor in the trip generation to account for partial loads and associated trips. Justification of the percentage of single source container loadings versus multi-source loading as a factor in the full truck trips assumption.</i></p>	<p>The strategic model identified the routes that would be used by trucks to access the SIMTA site and to account for traffic attributable to the SIMTA proposal. Section 2.1.3 of Appendix F of <i>the Transport and Accessibility Impact Statement</i> outlines the assumptions for calculation of rigid truck movements generated as a result of warehousing activities on the site. It is assumed that each truck would be filled to approximately 80% capacity, rather than capacity (i.e. 10 tonnes out of 12.88 tonne capacity).</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>In the local Sydney metropolitan context, the percentage of container trips that are suitable for the use of BDouble transport is low, due to likely different origins and destinations of individual containers, the</p>	<p>Section 6.3.2 of the <i>Transport and Accessibility Impact Assessment</i> outlines the calculations used for daily articulated truck generation. It notes that only 30% of truckloads per day will be carried by B-</p>	<p>Appendix F <i>Transport and Accessibility</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>ability of B-Doubles to use the road networks within the Sydney Metro area to access end customers, and the ability of receiving yards to cater for these oversized vehicles. The quoted percentage used in the trip generation estimate does not differentiate between a scenario which may apply to a port gateway like Botany, where all container traffic is moving offsite and much of it is moving a considerable distance from the port (i.e. interregionally), and an intermodal facility such as SIMTA, which may have a much higher locally generated origin and destination of containers. Moreover, SIMTA is proposed to provide specifically for local intermodal demand rather than regional or interstate.</p> <p><i>It is recommended that a justification of the B-Double trip percentage applied to both the movement of outgoing and incoming container movements, specific to the style of operation proposed at the site is provided.</i></p>	<p>doubles (with the other 70% carried by semi-trailers). A sensitivity analysis was carried out to assess the impact of changing truck utilisation, increasing the proportion of B-doubles.</p> <p>The <i>Freight Demand Modelling</i> report provides clarification on the freight demand catchment, freight origins and freight destinations within Metropolitan Sydney. Section 3.3 of this report analyses future year container distribution, including changes to container distribution as a result of external market forces. Section 3.4 outlines the future year container volumes within Metropolitan Sydney.</p> <p>Vehicle utilisation and freight destinations have been incorporated within the trip generation modelling within the TIA and the <i>Freight Demand Modelling</i> report.</p>	<p><i>Impact Assessment – Transitional 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>
	<p>Due to the costs involved in double handling a container, comparison of B-Double use for a gateway port like Botany may not be appropriate – the containers from Botany lend themselves to loading on B-Doubles because they have road based destinations far afield. Intermodal terminals are much better at handling locally generated freight, i.e. for within the Sydney Metropolitan region. In this local context, the potential for two containers picked up from an IMT to be heading to the same location (or at least two locations close enough to warrant a dual drop off) simultaneously is reduced.</p>	<p>As noted in the <i>Economic Assessment</i>, the SIMTA proposal operations will involve freight being loaded onto trains at Port Botany, directly transporting containers to Moorebank on a dedicated freight line, unloading the containers at Moorebank into warehouses on site or onto trucks for delivery to businesses and warehouses across southwest Sydney.</p> <p>A <i>Freight Demand Modelling– Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013a) report has been included in Appendix G of the EA to further clarify the intended freight catchment of the SIMTA proposal and provide an explanation of the import/ export supply chain currently operating within the Sydney Metropolitan Region. It acknowledged in the study that:</p>	<p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013a)</p> <p>Appendix X <i>SIMTA Moorebank intermodal</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>“for an intermodal terminal to be commercially viable it must be able to offer door to door delivery price inclusive of its bundled costs, that can compete with the cost of direct road delivery from the port. This bundle of costs include rail handling at port, rail transfer from port to intermodal terminal and delivery cost from intermodal terminal to delivery point, including container return intermodal terminal. Accordingly, the further the delivery point is away from the intermodal terminal, the less competitive it becomes against the cost of direct road delivery.”</i></p> <p>It is for this reason that IMTs within the Sydney region have defined freight catchments that they would service. The SIMTA proposal would service only those areas where the cost of delivery of freight via the intermodal is competitive.</p>	<p><i>Terminal Economic Assessment</i> (Urbis, June 2013a)</p>
	<p>In the assessment, the same rate for B-Double use for full containers being transported away from the IMT is applied for trips of containers back to the IMT. For similar reasons as stated above, the percentage occurrence of this use may be overstated in the assumption, due to the limited ability of end destinations to be able to concurrently process more than one container at a time and the limited ability of freight operators to arrange dual pickups, of different sized containers. It is also noted that B-Double trucks do not have the ability to self-load a container that some semi-trailers do. As such, any B-Double trip could only service end customers who have a fully equipped depot with the capacity to lift containers on and off trucks (since it is not possible to access the forward container like from a loading dock access). The percentage of end users within the Sydney Metropolitan Region who have the capability to lift loaded containers on and off B-Double trucks is relatively small, and as such for all of these reasons the estimated percentage of B-Double trips used in the trip generation may be over-estimated, meaning a higher number of semi-trailer trips would be required increasing the impact on the road</p>	<p>Section 6.3.2 of the <i>Transport and Accessibility Impact Assessment</i> outlines the calculations used for daily articulated truck generation. It notes that only 30% of truckloads per day will be carried by B-doubles (with the other 70% carried by semi-trailers).</p> <p>A truck utilisation of only 30% of trips by B-doubles can be considered conservative. It is noted in Section 6.3.2 of the TIA that:</p> <p><i>The SPC Freight Logistics Plan forecasts an increase in truck utilisation from 2.1 (2006) to 2.3 by 2016.</i></p> <p>It is acknowledged that B-doubles will only make trips to end customers with the infrastructure and equipment to receive B-double trucks. B-doubles are currently used to transport freight directly from Port Botany to end customers, and it is therefore presumed that these end customers will continue to be able to support the use of B-doubles.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	network.		
	<p>A 1.3 containers (2.1 TEU) average rate per truck is quoted as being business as usual in accordance with the Sydney Ports Corporation Freight and Logistics Plan (2008). It is unclear if this rate is applicable to the SIMTA facility because the SPC rate may apply on a State-wide basis, whereas SIMTA may cater to a higher percentage of locally generated trips for which B-Double transport is not appropriate.</p> <p><i>It is recommended that the proponent provides a justification to support the 1.3 TEU per truck assumption, as it relates to IMT operation as distinct to the Sydney Ports Corporation business as usual approach, which may factor in a higher number of regional or long distance road based trips. Sensitivity assessment of alternate potential scenarios.</i></p>	<p>Section 6.6.2 of the <i>Freight Demand Modelling</i> report provides assumptions around vehicle utilisation. It notes that the “business as usual” truck utilisation of 1.3 containers per truck (equivalent to 2.08 TEUs per truck) represents a split between B-doubles and semi-trailers of about 30% and 70% respectively. Furthermore, it is noted that:</p> <p><i>The SPC Freight Logistics Plan forecasts an increase in truck utilisation from 2.1 (2006) to 2.3 by 2016.</i></p> <p>Sensitivity testing was carried out on a range of vehicle utilisation parameters within the <i>Freight Demand Modelling</i> report and <i>Transport and Accessibility Impact Assessment</i>.</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, August 2013a)</p>
	<p>An optimistic scenario of back-loading has been adopted where 30% of trucks arriving at the IMT to drop off, also pick up in the same trip. No sensitivity analysis or research has been provided to support this assumption.</p>	<p>The proportion of 30% back loading assumed in articulated trucks estimation has a minor impact to overall truck trip generation. In addressing the TfNSW and RMS’s issues identified in their response to Concept Plan application dated 14 March 2012, Hyder has undertaken sensitivity analysis using higher order truck trip generation assumptions documented in “Intermodal Freight Terminal Traffic Generation Rates” report, dated 30 August 2011, prepared by Aurecon.</p> <p>Hyder’s sensitivity analysis has found that a proposed four lane</p>	<p>Appendix F <i>Transport and Accessibility impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting,</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>upgrade on Moorebank Avenue will accommodate additional traffic in peak times as indicated by Aurecon's trip generation should a higher trip generation be achieved. It is recommended that an actual truck trip generation survey from SIMTA site is undertaken after 24 months of operation of the terminal. There is a need to validate truck traffic generation prediction as SIMTA site is developed progressively.</p>	<p>August 2013a)</p>
	<p>A key issue is that the assessment relies on the assumption that no empty containers leave the empty container depot to be taken out to customer's yards for filling. Although some freight companies may be able to arrange to drop off a newly emptied container to a customer waiting to fill a container without returning to the empty container depot, this would not be the norm. Not all depots and freight customers receive full containers and then immediately re-fill them for transport back to the IMT. Many customers are net exporters and require empty containers to be delivered in order for them to fill. Even if customers receive a full container, empty it and then need to fill a new container, many do not have storage onsite for empty containers or the funds to incur costs for holding the container between when it might be empty and filled, and so would call an empty container to their yard for filling when they are ready rather than keep an empty container on hand.</p> <p>The movement of empty containers by road out of the SIMTA site appears to be a very real possibility; however, these movements have not been included in the assessment. In Figure 4-1 below taken from the Transport and Accessibility Impact Assessment (Hyder, [c], 2013), this would be shown as a movement from external depots/customers, to the empty container depot, then back out to external depots/customers, and finally back to the IMT. This trip generation and subsequent impacts on the road network have not been included in the assessment and are potentially significant, given that up to</p>	<p>A <i>Freight Demand Modelling</i> report has been prepared to determine the overall movement of container trucks to / from Port Botany and other intermodal terminals with and without SIMTA.</p> <p>Figure 6 provides a diagrammatic representation of the import export container supply chain. The container supply chain diagram incorporates the repositioning of empty containers to the container park that owns the containers, export customers, the intermodal terminal and Port Botany. Alternative supply chains including empty containers have also been considered, and are outlined in Table 4-6.</p> <p>Trip generation numbers modelled with the <i>Freight Demand Modelling</i> report and the <i>Transport and Accessibility Impact Assessment</i> have been based on the movement of both full and empty, export and import containers.</p> <p>Empty containers will be transported from the Intermodal terminal to export customers and to Port Botany. These trips have been included in the calculation of the trip generation, which also accounts for the movement of containers from the empty container depot to export customers and Port Botany.</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, August 2013a)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>25,000 TEU's are proposed to be returned full to the IMT.</p> <p><i>It is recommended that a confirmation is provided by the proponent that no empty containers will be taken offsite except by rail, or recalculation of the trip generation to account for the movement of containers from the empty container depot to customer depots/ loading bays for filling.</i></p>		
	<p><b>Hourly Profile</b></p> <p>The quoted hourly profile for heavy vehicle movements has been adapted from SKM work on the Enfield IMT, which was in turn adapted from the Port of Melbourne. The report recognizes that the Port of Melbourne has a significantly different style of operation as it does not have warehousing facilities. In the absence of any other information, this daily profile is adopted. No discussion of alternative profiles or sensitivity testing has been carried out.</p>	<p>In addressing the TfNSW and RMS's issues identified in their response to Concept Plan application dated 14 March 2012, Hyder has undertaken sensitivity analysis using higher order truck trip generation assumptions documented in "Intermodal Freight Terminal Traffic Generation Rates" report, dated 30 August 2011, prepared by Aurecon.</p> <p>Hyder's sensitivity analysis has found that a proposed four lane upgrade on Moorebank Avenue will accommodate additional traffic in peak times as indicated by Aurecon's trip generation should a higher trip generation be achieved. It is recommended that an actual truck trip generation survey from SIMTA site is undertaken after 24 months of operation of the terminal. There is a need to validate truck traffic generation prediction as SIMTA site is developed progressively.</p>	<p>Section 18</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>There is the potential that the daily profile adopted does not match that which might be expected to arise from the operation of a large IMT including warehousing facilities. In this case, it would be appropriate to undertake a sensitivity analysis or apply a factor to the trip generation rates to ensure they offer a conservative approach. Neither of these mitigations has been adopted, and thus there is the potential for the daily trip profile to underestimate the peak hour impacts, specifically for heavy vehicle movements.</p>	<p>Section 6.6 of the <i>Transport and Accessibility Impact Assessment</i> outlines sensitivity testing carried out to assess the impact of changing container size, vehicle utilisation and employee totals. In addition, Section 8.2 of the report provides a sensitivity analysis of trip generation using higher truck generation rates from a report produced by Aurecon (2011). Table 8-3 of the report shows predicted truck movements in morning and afternoon peak hours between the two studies and the relative impact associated with a</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		change in truck trip generation numbers.	Consulting, August 2013a)  <i>Intermodal Freight Terminal Traffic Generation Rates</i> (Aurecon, August 2011)
	<p><b>Sensitivity test of employment</b></p> <p>Although a sensitivity test of employment is discussed, no trip assignment or modelling of the potential impacts of an increase in employment has been undertaken. The 2013 EA notes that “the Needs Assessment for Moorebank Intermodal Terminal Facility (PWC, March 2011) estimates a maximum of 2,840 employees; about a 26% increase. Assuming the same proportion of employment between the warehouse and ancillary freight village staff, this number of employees would result in about 4,544 movements per week day.” (Hyder, [c], 2013)</p> <p>An additional 931 employee movements to the site each day would result if the PWC numbers are correct. The impact of this traffic on the road network would be significant. Limited discussion of why a lower rate than that identified in the PWC report has been adopted is provided in the assessment. There is a risk that the employment generated by the site is greater than stated in the report, potentially resulting in more significant traffic impacts.</p> <p><i>It is recommended that a discussion is provided of the various published employment forecasts for the development and justification of the adopted estimate. Sensitivity testing to examine other potential scenarios.</i></p>	The additional 931 employees can generate up to 931 trips if all employees use car as their travel mode. Hyder’s sensitivity analysis has found that a proposed four lane upgrade on Moorebank Avenue will accommodate additional traffic in peak times as indicated by Aurecon’s trip generation should a higher trip generation be achieved. It is recommended that an actual truck trip generation survey from SIMTA site is undertaken after 24 months of operation of the terminal. There is a need to validate truck traffic generation prediction as SIMTA site is developed progressively.	Section 18  Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p><b>Halcrow review of Hyder Paramics Modelling</b></p> <p>Appendix E of Hyder, [c] (2013) contains the Paramics (Traffic) Model Audit, a review by Halcrow of the Paramics Modelling undertaken by Hyder. The Report is dated 29 July 2011, and reviews the base case scenario developed by Hyder.</p> <p>The updated 2013 EA does not appear to close out or specifically address the issues raised by the Paramics (Traffic) Model Audit (Halcrow, 2011) in their review of the modelling, which include:</p> <ul style="list-style-type: none"> <li>&gt; Review the suitability of adopting All-or-Nothing route assignment</li> <li>&gt; Review the sum of vehicle proportion and justify the need of periodic vehicles files</li> <li>&gt; Consider the adoption of multiple arrival profiles for origin zones</li> <li>&gt; Review the coding of priority control for eastbound off-ramp at M5/Moorebank intersection</li> <li>&gt; Verify the correctness of bus operation along Hume Highway</li> <li>&gt; Review the physical location of node 118 in the models</li> <li>&gt; Provide explanation on reported operational issues 8 and 9, and their corresponding delays; and</li> <li>&gt; Various other matters related to trip generation, some of which overlap with those identified in this review.</li> </ul> <p><i>It is recommended that information is provided to close out of the modelling issues raised by Halcrow in their 2011 independent review.</i></p>	<p>Following Halcrow's review, modelling adjustments were undertaken to the core area Paramics network. The <i>Transport and Accessibility Impact Assessment</i> incorporates all changes recommended by Halcrow as discussed in Section 1.2 of this report.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p><b>Cumulative traffic impacts</b></p>	<p><i>The Freight Demand Modelling</i> report and the <i>Transport and</i></p>	<p>Section 3.3.2</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>As details of the base traffic volumes and model development are not provided, it would appear that cumulative developments associated with future redevelopment in the Moorebank precinct have not been identified or added to the modelled network. Of particular concern is the Commonwealth MIT proposal, while others include the Goodman Fielder Bakery and the proposed construction waste recycling center. Cardno understand that the exclusion of the Commonwealth MIT site trip generation is based on an assumption that there is not demand for more than 1 million TEU's in the catchment for the Moorebank IMT. There are potentially some serious flaws in that assumption, which include:</p> <ul style="list-style-type: none"> <li>&gt; The economies of scale and competitive advantages presented by having a very large IMT village will draw demand from other areas;</li> <li>&gt; As port congestion increases the need to move more freight from IMT's will increase</li> <li>&gt; A potential IMT with a sum total of potentially up to 2.7 million TEU's will generate its own demand.</li> <li>&gt; Over the period of time prior to the 2031 forecast traffic modelling horizon, it is improbable that there would not be significant development on currently underutilized commercially viable land in the area.</li> </ul> <p>These factors may result in the future year traffic network volumes being low, and thus a higher level of congestion and traffic impacts resulting and road infrastructure being required to mitigate impacts.</p> <p><b>Identified as a key issue</b></p>	<p><i>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>Section 3.3.2 of the EA discusses the relationship of the SIMTA proposal to the adjacent MICL proposal. As per the <i>Freight Demand Modelling</i> report, the section notes that, should both proposals proceed the port freight catchment would be shared between the two facilities.</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 (MICL Information Boards, October 2013 &amp; 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>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 – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>Correlation of the estimated trip generation with actual real life examples of similar operating IMT's, rather than theoretical EIS</p>	<p>Trip generation assumptions have been tested with varying key input parameters. The impact of a higher truck trip generation rates</p>	<p>Appendix F <i>Transport and</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>estimates which may be subject to biases, errors in calculation or based on comparison with terminals with different operational characteristics.</p>	<p>have been assessed on infrastructure needs and its requirements that will provide an acceptable level of service in the longer term. The analysis found that Hyder's recommended mitigation measures, as outlined in Section 8 of the <i>Transport and Accessibility Impact Assessment</i>, would provide acceptable level of service to the assessed road network.</p>	<p><i>accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>Details of all mitigation measures proposed at intersections and roads which are required to be upgraded, the likely cost of these works, as well as a commitment by the proponent as to the level of funding they intend to supply towards these upgrades. Details of how the westbound onramp merge with the M5 would be addressed. Confirmation that the proposed upgrades required are feasible and constructible. It is noted that the required mitigation measures may extend to Local Area Traffic Management schemes or pavement maintenance which may become required as a result of general traffic bypassing congested arterial road corridors via the Council local or regional road networks due to increased arterial road congestion as a result of the development.</p>	<p>Section 5.5 and 6.10.1 of the <i>Transport and Accessibility Impact Assessment</i> provides an analysis of the anticipated Level of Service (LoS) on these five intersections with, and without the SIMTA proposal respectively. It was identified that in both cases all five intersections have been considered to have poor LoS. Section 8 of this report outlines the required infrastructure upgrades necessary to deliver adequate capacity for the road network until 2031 and includes details of the proposed upgrade works (including of the M5 westbound on-ramp). It is noted that:</p> <p><i>The timing of the individual road and intersection capacity improvements will depend on a number of factors, but the prime factor would be the rate of development within the SIMTA site. A staged approach [to the road network upgrades] would be required as development progresses across the site.</i></p> <p>These road network upgrades would be discussed and negotiated with RMS, and potentially impacted stakeholders as identified in the Statement of Commitments (refer to Section 18 of the EA).</p> <p>Mitigation measures, including infrastructure upgrades is included in Section 5.3.4.2 of the EA, and summarised in Section 16. Funding arrangements will be determined during progression of detailed design for the subsequent development stages. SIMTA will remain</p>	<p>Sections 5.3.4.2, 16 and 18</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
		in consultation with all key stakeholders.	
	The amenity of surrounding streets containing residential and community uses should be considered with respect to on street amenity impacts, particularly streets proximate to the northern end of Moorebank Avenue and Anzac Road.	Load limits and road treatments can 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.	N/A
	Confirmation that the proponent would be willing to commit as a condition of consent requiring staff shift change over times to not overlap with the peak traffic periods experienced on the adjacent road, rail or public transport networks where these networks experience or are predicted to experience congestion within the modelled horizon of the project.	<p>Section 6.4 of the <i>Transport and Accessibility Impact Assessment</i> states:</p> <p><i>The analysis assumed that SIMTA (terminal warehouses) will operate in two shifts over part of the day. It is expected that the first shift will start prior to 07:00 and finishing around 16:00. The second shift would start at around 16:00 and finish after 12:00 midnight. Actual start and finish times is expected to be staggered to spread out parking and traffic demand.</i></p> <p>The expected staggering of shift times would reduce peak traffic impacts from employee trips. Furthermore, the AM peak one hour car movements represents about 19.1% of total daily car movements and the PM peak one hour car movement represents about 17.4 % of total daily car movements as per Section 6.4 of the <i>Transport and Accessibility Impact Assessment</i>.</p>	Appendix F <i>Transport and Accessibility Impact Assessment – Transitional part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)
	Details of the 2011 and 2031 road networks used in the Strategic and	The <i>Transport and Accessibility Impact Assessment</i> includes information on the road networks used in the model analysis. The	Appendix F <i>Transport and</i>



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>Paramics Models should be made available.</p> <p>Details of the future land use data for the 2031 transport model should be made available especially the assumptions adopted for the Liverpool LGA.</p> <p>Intersection results summary should be provided for all intersections (in both without and with SIMTA development) across the modelling horizon to assess the impact of the SIMTA development on the external road network.</p>	<p>modelling results and data included within the <i>Transport and Accessibility Impact Assessment</i> should be adequate for any assessment requirements. Additionally clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.</p>	<p><i>Accessibility Impact Assessment – Transitional part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>Clarification and justification of the assumptions made in calculation of the trip generation of the development.</p> <p><b>Identified as a key issue</b></p>	<p>The <i>Transport and Accessibility Impact Assessment</i> includes information on the road networks used in the model analysis. The modelling results and data included within the <i>Transport and Accessibility Impact Assessment</i> should be adequate for any assessment requirements. Additionally clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.</p> <p>All assumptions and calculation methods used within the traffic modelling approach are outlined in Section 4 and Section 5 of the <i>Transport and Accessibility Impact Assessment</i></p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p>Recommendations in regards to minimum infrastructure upgrades at failing intersections. Additional detailed intersection modelling should be undertaken incorporating the proposed mitigation measures at the poorly performing intersections to determine the proposed mitigation measures will result in acceptable traffic operation.</p>	<p>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 <i>the Transport and Accessibility Impact Assessment</i> and Section 5.3.4.2 of the EA. Mitigation measures, with maps and sketch plans of the proposed upgrades are provided in Appendix F: <i>Transport and Accessibility Impact Assessment</i> (Appendix F – Sketch Plan of the Proposed Upgrade).</p> <p>The traffic conditions on the road network pre-upgrade (existing) are discussed in <i>Appendix F2: Transport Accessibility Impact</i></p>	<p>Section 5.3.4.2</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>Assessment Technical Note 4: Existing Road Network Capacity Issues.</i> Traffic conditions during the upgrade will be identified and mitigation measures proposed in the Construction Environmental Management Plan (CEMP).</p> <p>Further, the following statement of commitment has been updated:</p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Provide a new traffic signal at SIMTA's northern access with Moorebank Avenue.</i></li> <li>▪ <i>Provide a new traffic signal approximately 750 metres south of SIMTA Central access.</i></li> <li>▪ <i>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.</i></li> <li>▪ <i>Concurrent with four lane widening on Moorebank Avenue, the Moorebank Avenue/Anzac Road signal will required some form of widening at the approach roads.</i></li> <li>▪ <i>Potential upgrading works at the M5 Motorway/Moorebank Avenue grade separated interchange to cater for both background and additional SIMTA traffic growth as outlined in Table 9-1 of the Transport Accessibility Impact Assessment (and Table 6 of the Environmental Assessment report).</i></li> </ul>	<p>Consulting, August 2013a)</p> <p>Submissions Report</p>
Noise and Vibration	<p><b>Sensitive Receivers:</b> The 2013 assessment has not identified the receivers in residential accommodation at the SME site and does not appear to have undertaken baseline noise measurements at or in the</p>	<p>Whilst there are currently residential type receivers within the SME area, the Moorebank Units Relocation Project is currently underway which include the relocation of the SME site from Moorebank to the</p>	<p>Appendix I <i>Noise Impact Assessment</i> –</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>vicinity of the site along Moorebank Avenue. As a result, these receivers have not been assessed.</p> <p><i>It is recommended that additional construction and operational noise and vibration assessment is required for the SME site. It is anticipated that some liaison with Defence for the SME site will be required to determine the location of residential accommodation on the SME site, to enable acoustic assessment for these noise sensitive receivers.</i></p>	<p>nearby Holsworthy Barracks. Works for the Moorebank Units Relocation Project commenced 10 December 2012, and as such, 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, <a href="http://www.minister.defence.gov.au">http://www.minister.defence.gov.au</a>, 2012).</p>	<p><i>Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Existing Noise Levels:</b> With reference to Appendix A, extraneous weather periods have been shaded in grey however it is unclear if the assessed noise levels have been filtered to exclude extraneous weather effects as per the NSW Industrial Noise Policy (INP) guidelines and any other extraneous noise sources that may have affected the measured noise levels.</p> <p>Weather, including wind and rain are to be excluded from the assessed noise levels as per the INP. If extraneous noises and weather effects have not been appropriately excluded from the dataset, assessed noise levels that form the basis of the project specific noise criteria may be skewed higher or lower than what it should be. This will also affect potential noise mitigation treatments.</p>	<p>Consistent with the NSW Industrial Noise Policy (INP), weather affected periods and extraneous events have been excluded from the logging data, prior to the calculation of Rating Background Levels (RBL). The RBL calculations have been conducted in accordance with the INP.</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Operational Noise Sources:</b> There are a number of plant items that have been listed in Table 6-1 (operational noise sources) of the Noise Impact Assessment (Wilkinson Murray, 2013). It is unclear whether the sound power levels take into account transient noise events such as shunting of train locomotives on site for example. It is understood that the data has been sourced from SIMTA; however it is unclear whether the source sound power levels are based on a Standard or derived from existing plant in an equivalent (or representative) facility.</p>	<p>The sound power levels listed in Table 6-1 are based on the <math>L_{Aeq, 15min}</math> noise descriptor. This takes into account the total sound energy from the source in a 15 minute period. It is important to note however, that some high intensity noise event that occur over short durations often have little effect on the <math>L_{Aeq, 15min}</math> level. Accordingly, these events are assessed in their potential to cause sleep disturbance (Section 6.2). Source sound power levels (SWL) are not based on standards; rather they are derived from a combination of manufacturer data, measurements by (WMPL) and others.</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p><b>Operational Noise Sources:</b> The LAeq noise level descriptor has been used to represent the average noise emission level of the plant items over a 15 minute period. It is assumed firstly that there is a commitment by the operator of the site to use hybrid energy equipment (which is generally lower noise output compared to diesel or combustion engine powered plant) as per the assessment. Additionally, based on previous experience there has been a discrepancy between the quoted theoretical sound power data for plant and equipment, and the same plant and equipment tested on-site. There is a risk that theoretical sound power levels may result in potentially lower modelled noise impacts. Therefore, it is considered more appropriate to use actual measured source noise levels where feasible to minimise this risk.</p>	<p>The best data available to WMPL has been used for plant items on site. In some cases, this data is based on measurements of plant at other sites such as Enfield, Port Botany and Port of Melbourne. In the case of hybrid electric plant, it is difficult to conduct measurement of these machines as they are considered ‘state of the art’ and are not commonly in use within Australia.</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Operational Noise Sources:</b> Depending on the freight arriving on site, it is considered that refrigerated containers may be temporarily stored on site. It is unclear from the 2013 EA if refrigerated containers have been considered.</p>	<p>It has not been envisaged at this stage that refrigerated or frozen material will require handling or storage on site and it is not expected that warehouses will require heating.</p>	<p>N/A</p>
	<p><b>Road Traffic Noise Assessment:</b> The input data used in Table 6-5 of the Noise Impact Assessment (Wilkinson Murray, 2013) is consistent with the data used in the previous 2012 EA. Therefore, as per the review comments made regarding the 2012 assessment, there is no reference to:</p> <ul style="list-style-type: none"> <li>&gt; Which year has been modelled as “current”;</li> <li>&gt; Which year has been modelled as the “Future” – with the development;</li> <li>&gt; General annual vehicular traffic growth (background growth) on Moorebank Avenue and the M5 motorway and if this is included in the</li> </ul>	<p>The ‘current’ and ‘future’ traffic scenarios modeled were for years 2013 and 2022 respectively. Traffic volume and mix were provided by traffic engineers at Hyder Consulting Pty Ltd.</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p> <p>Appendix F <i>Transport and Accessibility Impact</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>projected “future” road traffic predictions.</p> <p>&gt; Where the traffic data (baseline and forecast) has been referenced from and if there is consistency between specialist studies including traffic, air quality, GHG and noise.</p> <p>Clarification is required to determine net impacts of road traffic noise from the site and reassessment of the SME site is also required.</p>		<p><i>Assessment – Transitional part 3A Concept plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p><b>Rail noise assessment:</b> It is unclear if the RailCorp noise data used for the rail noise assessment is of rail cars loading and unloading on site, diesel locomotives idling or takes into account shunting of rail cars and other transient events such as containers being dropped onto hardstand areas. The assessment also does not identify at what location within the proposed rail loop the levels were taken.</p> <p><i>The rail noise assessment has been undertaken using Railcorp noise level data, as well as the IGANRIP noise assessment policy. It should be noted that in addition to clarification of the Railcorp noise data, the assessment should be undertaken with reference to the current RING noise assessment policy.</i></p>	<p>This data was used for the IGANRIP of rail traffic noise within the rail corridor. The predicted levels were at the most affected location within each receiver catchment.</p> <p>As per Section 5.4 the application of RING is identical to that of IGANRIP for the proposed rail development associated with SIMTA.</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Rail noise assessment:</b> Source sound power levels (and conditions, i.e. rail car shunting) have not been documented other than a single reference in the sleep disturbance section of the report (Refer Section 6.2). In this section, an L<sub>Amax</sub> sound power level of 118dB(A) is referenced for these activities.</p> <p>For assessment of L<sub>Aeq</sub> noise levels from rail activities, the assessment should clearly state the sound power levels used so that the assessment inputs and outcomes can be verified.</p>	<p>The L<sub>Aeq</sub> SWL data in Table 6-1 show the noise source levels used for the assessment of rail activities under the operational noise assessment (Section 6.1).</p> <p>Modern shunting methods do not contribute significantly to L<sub>Aeq</sub> levels as the occurrence of loud bangs during shunting is infrequent. Accordingly, the assessment of banging noises from shunting is assessed for its potential to cause sleep disturbance (Section 6.2).</p>	<p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Cumulative Noise Generation:</b> It is understood that the total TEU</p>	<p>The <i>Freight Demand Modelling</i> report and the <i>Transport and</i></p>	<p>Appendix G</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>demand in the area is currently 1 million however it is understood that the SIMTA site alone is designed to accommodate 1 million TEUs per annum. The Federal site directly opposite (MIT) can also accommodate a further 1.7 million TEUs. We consider that the assumption made of a 50/50 split in capacity in the cumulative assessment is incorrect and is indicating a low noise impact as a result. It is feasible however at this stage to assume the location of plant items on the MIT site as it is understood that the site layout has not yet been released for review.</p> <p>The assessment is considered conservatively low and does not represent a worst case scenario. A doubling of capacity to 1 million TEUs on the SIMTA site may increase noise emissions from this site by at least 3dB(A); however it is noted that the MIT site is closer to residents at Casula and impacts may be higher as a result of peak capacity on both sites. Therefore the impacts are not appropriately addressed and this may also impact the effectiveness of noise mitigation treatments recommended in the report such as earth berms (heights and extent).</p>	<p><i>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><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 – Transitional part 3A Concept plan Application</i> (Hyder Consulting, August 2013a)</p>
	<p><b>Cumulative Noise Generation:</b> It is unclear if the cumulative assessment has been reviewed and documented under temperature inversion conditions, as the report has identified that temperature inversions will occur at the site. Temperature inversion can add to noise impact levels. If the cumulative assessment has not taken this into account, the predicted noise levels documented in the report may be lower than expected.</p>	<p>The cumulative assessment has been conducted during the night time (10.00pm-7.00am) period, using the <math>L_{Aeq, period}</math> noise descriptor. WMPL consider this the appropriate assessment methodology as the amenity criteria are designed to control noise emissions from multiple industrial sites. The effects of temperature inversions are not considered when assessing against the amenity criteria. Temperature inversion effects are transient and are not expected to significantly affect <math>L_{Aeq, period}</math> levels. Subsequently, a formatting oversight has been noted in Table 6-2 of the noise impact assessment. Table 6-2 should appear as follows: (attached).</p> <p>Further, the wording of paragraph 4 on page 27 of the <i>Noise Impact</i></p>	<p>Submissions Report</p> <p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>Assessment</i> is somewhat awkward. The first sentence of this paragraph should read:</p> <p><i>"Finally, for the assessment of operational noise levels against amenity criteria, the <math>L_{Aeq, period}</math> levels have been calculated by subtracting 3 dBA from the corresponding <math>L_{Aeq, 15min}</math> levels during adverse meteorological conditions."</i></p>	
	<p><b>Baseline data:</b> Minor discrepancies noted between the baseline (assumed current) values in the Noise Impact Assessment (Wilkinson Murray, 2013) and Table 3-2 of the Transport and Accessibility Impact Assessment, (Hyder, [c], 2013). The minor discrepancies are approximately several hundred vehicles per day, which is not likely to be significant given the large volume of vehicular traffic on the M5 Motorway. As noted, clarification is required in relation to future predicted road traffic volumes, including further assessment and consideration of vehicular traffic noise impact on the SME.</p> <p><b>Identified as a key issue</b></p>	<p>Table 3.2 of the <i>Transport and Accessibility Impact Assessment</i> presents daily traffic numbers which were estimated based on total peak hour traffic counts. Table 6.5 of the <i>Noise Impact Assessment</i> provides traffic numbers estimated from the AM and PM traffic peaks, representing day time and night time daily traffic estimates. It is noted that there is a slight discrepancy between the traffic volumes presented in the two reports as a result of minor differences in the assessment methodology.</p> <p>The variance in traffic numbers represents a negligible proportion of the total traffic volumes. It is not expected that the minor difference in traffic number will have a significant impact on traffic noise levels and will not alter the results presented in the <i>Noise Impact Assessment</i>.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix I <i>Noise Impact Assessment – Impact Assessment Report</i> (Wilkinson Murray, August 2013)</p>
	<p><b>Recommendations</b></p> <p>&gt; In relation to input data, including sound power levels of plant, rail noise and climatic conditions, it is recommended that this information</p>	<p>WMPL considers the noise impact assessment to be of the appropriate level of detail for Concept Plan approval.</p> <p>Greater levels of detail will be included in noise impact assessments</p>	<p>N/A</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	is clearly documented for clarity in the Noise Impact Assessment so that input data, assumptions and noise mitigation treatments can be properly verified. Additional tables and references in the report are required to address this issue.	for subsequent stages of the development.	
	> Cumulative noise impacts are recommended to be reassessed for all receivers on the basis of clarified and coordinated input data, for example peak output on both SIMTA and MIT sites, as well as site generated road traffic.	<p>It is not appropriate to model peak output on both SIMTA and MIT sites as the total throughput is limited by the catchment demand of approximately 1,000,000 TEU.</p> <p>The road traffic routes to both SIMTA and MIT are assumed to be the same, and therefore; the outcomes of the road traffic noise assessment with be unchanged.</p>	N/A
	Adjustments (additional column(s)) are recommended in the cumulative noise assessment section (Table 7-1) to distinguish operational noise emissions from the SIMTA site and a separate column for combined noise impacts. As stated previously, the assessment should indicate if the documented noise impact is inclusive of temperature inversions, alternatively, provide two separate tables, ie one under neutral conditions and the second under temperature inversion conditions to clearly identify potential noise impacts under worst case conditions.	Adjustments have been made to Table 7-1. The revised table has been included in the Submissions Report.	Submissions Report.
Biodiversity	Design of the rail corridor link should be based on avoiding or at least minimizing impacts on the two threatened plant species to conserve areas of remnant vegetation and remnant woodland which would act to mitigate impacts on the three threatened fauna species at the site.	<p>The alignment of the rail spur on the land to the south of the SIMTA site is designed for 35 kph speed with a minimum horizontal curve radius of 200 metres. The alignment has been determined based on current design specifications and requirements prescribed by ARTC.</p> <p>Relocation of the rail link to the east of the SIMTA site would result in a lesser impact to individual flora species (<i>Persoonia nutans</i> and <i>Grevillea parviflora subsp. Parviflora</i>) within the rail corridor; however, it would result in rail, freight handling and truck movements occurring closer to the residences at Wattle Grove and</p>	Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>Moorebank, with reduced opportunities for constructed warehouses to effectively attenuate noise and air emissions generated by the terminal operations, or provide visual screening of the operation. It would also pose a safety hazard to the site by reducing the separation between truck container transfer points and warehouse container storage areas.</p>	
	<p>The Assessment of Significance provided for <i>Grevillea parviflora</i> subsp. <i>parviflora</i> in Appendix 6 of the Flora and Fauna Assessment (Hyder, [e], 2013) should be revised with the conclusion amended to determine that the proposed works will result in a significant impact on this species.</p>	<p>The Assessment of Significance found that the proposed rail link will result in the removal of 634 stems from an estimated population of 4110 stems, which represents a loss of 15% of stems. The area of core occupied habitat to be removed is approximately 0.21 hectares from the 5.81 hectares of core occupied habitat recorded in the study area, a loss of 4%. The proposed rail link intersects the western edge of the recorded population and will not fragment a large area of known habitat from other areas of known or potential habitat. As such, it is not considered likely that the SIMTA proposal constitutes a significant impact on the Vulnerable species <i>Grevillea parviflora</i> subsp. <i>parviflora</i>.</p> <p>It is acknowledged that the population of <i>Grevillea parviflora</i> subsp. <i>parviflora</i> in the study area is considered highly significant, given that the population size is relatively large and due to the very low occurrence of this species in the western Sydney region. However the proposal is considered unlikely to place the local occurrence of the species at risk of extinction.</p>	<p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)</p>
	<p>The Cumberland Plain Land Snail (<i>Meridolum corneovirens</i>) is known to occur in the area but was not considered or assessed to determine if the proposed rail route would result in significant impacts. Targeted surveys along the proposed rail alignment should be undertaken to determine if this species is present and the level of impact that will occur as a result of the proposal.</p>	<p>There are no records of the Cumberland Plain Land Snail in the study area in the NSW Wildlife Atlas. There are records for the species near the study area, as shown on Figure 11 of the Flora and Fauna Assessment (Appendix J of the EA). The closest record to the SIMTA site is dated from 2006 and located approximately 100 metres to the east of the DNSDC site in an area mapped as Shale Gravel Transition Forest (DECCW 2009). There are a number of</p>	<p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>additional records of this species dated from between 1999 and 2006 in Shale Gravel Transition Forest, Castlereagh Swamp Woodland and Castlereagh Scribbly Gum Woodland to the south of the East Hills railway line.</p> <p>Searches for the Cumberland Plain Land Snail were undertaken in areas of suitable habitat (leaf litter and beneath logs) during field assessment. The species was not identified in the study area.</p>	Consulting, 2013)
	<p>Offset sites have not been identified in the BOS document. Offset Measure A has been identified as SIMTA's priority option. Offset Measures B and C are lacking in any specific detail and cannot therefore be assessed. The BOS provides no recognition that a suitable offset site to satisfy Offset Measure A is available to offset the clearing proposed by the project.</p> <p><i>A site for Offset Measure A should be identified through a detailed investigation prior to the proposed works being approved. Should a specific offset measure not be pursued prior to approval then greater detail of additional Offset Measures B and C should be identified in a more comprehensive Biodiversity Offset Strategy.</i></p>	<p>A Preliminary Biodiversity Offset Strategy has been developed which sets out measures and priorities for the identification of offsets. The progression of this strategy is included with the Statement of Commitments. SIMTA is currently progressing the identification of offsets in accordance with the strategy.</p> <p>The following statement is contained within the Statement of Commitments (in this Submissions Report):</p> <p><u>Off-Set Impacts</u></p> <p><i>The Proponent will update the Preliminary Biodiversity Offset Strategy (Hyder Consulting 2013) and continue to consult with the Department of the Environment (DOTE) and the NSW Office of Environment and Heritage (OEH) through the project approval process.</i></p>	<p>Submissions Report</p> <p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)</p>
	<p>The BOS should utilise the Biodiversity Certification Assessment Methodology (BCAM) (DECCW, 2011) in order to assess the loss of biodiversity as a result of the proposed works and whether the proposed offsetting will result in improving or maintaining the biodiversity values that would be lost as a result of the proposed project.</p>	<p>The Preliminary Biodiversity Offset Strategy was prepared in accordance with:</p> <ul style="list-style-type: none"> <li>▪ Principles for the use of biodiversity offsets in NSW (OEH, 2011);</li> <li>▪ NSW OEH Interim Policy on assessing and offsetting biodiversity impacts of Part 3A, State significant development (SSD) and State significant infrastructure (SSI) projects</li> </ul>	<p>Appendix J2 <i>Biodiversity Offset Strategy</i> (Hyder Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<ul style="list-style-type: none"> <li>▪ NSW offset principles for major projects (state significant development and state significant infrastructure) (OEH 2013)</li> <li>▪ Environment Protection and Biodiversity Conservation Act 1999 Environmental Offsets Policy (DSWEPC 2012).</li> </ul> <p>The Biodiversity Certification Assessment Methodology (BCAM) is intended for assessment of the loss of biodiversity values or the impact of conservation measures on land proposed for biodiversity certification by a planning authority. The study area is not proposed for biodiversity certification, therefore the application of the BCAM is not considered appropriate.</p>	
Biodiversity	The minimum estimated land required for offsetting has also been defined as 0.74 ha of <i>P. nutans</i> habitat. This number was derived from the sum of occupied and potentially occupied habitat that will be removed and does not account for edge effect as a result of the proposal, areas of impact due to isolation as a result of the proposal, or the offset percentage based on BCAM.	The quantum of the offset will depend on the precise alignment of the rail link, and impacts on threatened species and communities, would be determined during the detailed design phase. The potential impacts on flora and fauna will be assessed in greater detail in association with the detailed applications for future stages.	Appendix J2 <i>Biodiversity Offset Strategy</i> (Hyder Consulting, 2013)
Biodiversity	Offsetting of <i>Grevillea parviflora</i> subs. <i>parviflora</i> has not been considered in the BOS. As discussed this species will be significantly impacted as a result of the proposal and would also require offsetting.	Consideration of offsets for <i>Grevillea parviflora</i> subsp. <i>parviflora</i> will be included in the Biodiversity Offset Strategy as the strategy document is progressed in consultation with the Department of the Environment and OEH.	Appendix J2 <i>Biodiversity Offset Strategy</i> (Hyder Consulting, 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Biodiversity	The boundary of the study area (shown in Figure 2 of the Flora and Fauna Assessment) does not extend beyond the eastern boundary of the SIMTA site. Given that potential impacts may extend beyond this boundary and the lack of certainty regarding the location and extent of impacts, it is recommended that the boundary of the study area is extended to ensure that all potential impacts are addressed.	<p>Given that a 20 to 25 metre cleared Endeavour Energy powerline easement and access track are located immediately to the east of the SIMTA site, it was considered unlikely that the SIMTA proposal will result in impacts in this area. There is no expectation that the location and extent of direct impacts will extend beyond the eastern boundary of the SIMTA site.</p> <p>The area to the east of the SIMTA site was inspected during field surveys, however no detailed surveys were undertaken. It is acknowledged that these areas support high conservation values including threatened ecological communities and threatened species habitat based on vegetation mapping and site inspections. It was also observed that there are existing edge effects on this vegetation from the DNSDC and powerline clearing, including weed invasion and light and noise impacts.</p>	<p>Submissions Report</p> <p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)</p>
Biodiversity	Section 3.2.4.1 (Vegetation observations) notes that “In the south-west is a large fenced area that was not accessible during the current survey”. It is recommended that the location of the area not included in the survey is illustrated on a map to clearly demonstrate the extent of this limitation. It is recommended that all areas within the study area which were excluded from the survey are noted within Section 2.4	The fenced area is Railcorp land in Lot 1, DP 825352. This area was assessed based on site observations from outside the fence as well as current and historical aerial photograph interpretation, regional vegetation mapping and database records. As stated in the report, this area was cleared prior to 1984 and the vegetation of the area was characterised by scattered <i>Acacia parramattensis</i> over dense exotic grass cover.	Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)
Biodiversity	Figure 7 (DECCW (2009) vegetation mapping of the study area) indicates Castlereagh Shale-Gravel Transition Forest directly east of site, in an area not surveyed in detail during the current study, or included in the vegetation mapping. Given that this vegetation type may be classified as Shale Gravel Transition Forest (a critically endangered community listed under the EPBC Act), and the level of uncertainty regarding potential impacts, it is recommended that this potential presence is addressed.	<p>No detailed surveys were undertaken in this area, but site inspections found that it appeared to be most consistent with Shale Gravel Transition Forest.</p> <p>This area was not included in the current study area as impacts to the native vegetation in this area are considered to be unlikely, given the presence of the 20 to 25 metre wide powerline easement adjoining the bushland. This area is already disturbed and the SIMTA proposal is considered unlikely to result in an increase in</p>	<p>Submissions Report</p> <p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		disturbance of this vegetation.	Consulting, 2013)
Biodiversity	The Aquatic Ecology Assessment included as Appendix 1 states that the Castlereagh Swampland Community within the vicinity of Anzac Creek and within the study area could be considered a groundwater dependant ecosystem. Any development within the Anzac Creek CSWL community should thoroughly consider potential impacts on groundwater quality and quantity as any localised pollution or reduction in the groundwater table is likely to influence this endangered community. It is recommended that this matter is addressed within relevant assessments for this community.	The SIMTA proposal is not expected to result in impacts on groundwater quality and quantity. Surface water flows from the site are not expected to significantly change as a result of the proposal as described in Section 4.1.1.2 of the <i>Flood Study and Stormwater Management Assessment</i> . Furthermore, any excavation of the site will be minimised.	Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)  Appendix P <i>Flood Study and Stormwater Management Assessment</i> (Hyder Consulting, 2013)
Biodiversity	To provide transparency in the assessment, it is recommended that a map of potential habitat for threatened species is included to demonstrate the areas used for the calculations in Table 24 (Threatened flora species habitat within the study area and SIMTA proposal footprint).	A map of potential habitat for threatened species that was used for the calculation has been included in the Submissions Report.	Submissions Report  Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)
Biodiversity	It is recommended that assessments for all threatened species which may be impacted upon (as identified in Table 17 (Threatened Flora Habitat Analysis) and 19 (Probability of threatened fauna species of the Flora and Fauna Assessment identified from the locality to occur	The site was subject to detailed flora survey, including intensive threatened species searches using 10 metre wide spaced transects. Most of the threatened plant species considered to have a possible likelihood of occurrence in the study area are relatively large and	Appendix J1 <i>Flora and Fauna Assessment - Impact</i>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	in the study area)) are included in relevant appendices.	<p>conspicuous and would probably have been detected in the surveys if present.</p> <p>Most of the threatened fauna species considered to have a possible likelihood of occurrence in the study area are mobile species including birds and bats which may utilise foraging habitat in the study area. The SIMTA proposal would have limited impacts on these species, should they occur in the study area.</p>	<p><i>Assessment Report</i> (Hyder Consulting, 2013)</p>
Biodiversity	<p>The threatened species, <i>Acacia pubescens</i>, was recorded directly east of the SIMTA property. Given the lack of certainty regarding the location and extent of impacts, it is recommended that this species is further assessed. The Flora and Fauna Assessment noted that this species is protected by a powerline easement. However, it is considered that there may be potential impacts which could breach this buffer.</p>	<p>Two individuals of <i>Acacia pubescens</i> were recorded at the edge of bushland immediately to the east of the SIMTA site, and it is possible that the species occurs further east. These two individuals are located approximately 20 to 25 metres east of the SIMTA site and are separated from the proposal by a boundary fence and cleared powerline easement. They are additionally on a slight rise above the powerline easement.</p> <p>Although the proposal is still at concept stage, the <i>Urban Design and Landscape Report</i> for the proposal (Appendix E of the EA) indicates that an internal road and landscaped areas are proposed along the eastern boundary of the SIMTA site. It is considered unlikely that the <i>A. pubescens</i> to the east of the SIMTA site will be impacted by the proposal.</p> <p>Furthermore, the following Statement of Commitment (Section 18 of EA) would provide a setback along the eastern boundary of the site:</p> <p><i>A 'boundary treatment' or 'buffer zone' along the other site boundaries, consisting of existing local species in the area and providing an essential scale of planting to complement the built form, including:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Eastern boundary: total buffer zone of 13.5 metres consisting of 2.5 metre landscape corridor, a 6 metre internal light vehicle access road and a five metre wide bio-retention swale.</i></li> </ul>	<p>Appendix E <i>Urban Design and Landscape Report</i> (Reid Campbell, June 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>It is unclear what the potential impacts on <i>A. pubescens</i> that could breach the buffer provided by the powerline easement, fence, internal road and landscaped areas are considered to be. The recovery plan for <i>A. pubescens</i> identifies the following threats to this species: loss of habitat; degradation of habitat through weed invasion, mechanical damage, rubbish dumping, illegal track creation, arson, horses and hybridisation; inappropriate fire regimes and disease. Through implementation of the mitigation measures identified within the EA, the SIMTA proposal would not result in impacts on <i>A. pubescens</i>.</p>	
Biodiversity	<p>The following comments related to the assessment of <i>Grevillea parviflora</i> subsp. <i>parviflora</i>:</p> <p>The assessment provided for the potential presence of Green and Golden Bell Frogs is generally restricted to habitat associated with Anzac Creek. It is recommended that all potential habitat areas for this species are addressed.</p>	<p>Note: it is assumed that this comment refers to Green and Golden Bell Frog.</p> <p>The study area was found to support marginal habitat for the Green and Golden Bell Frog. As well as Anzac Creek, formalised drainage channels in the south-east of the SIMTA site that support aquatic and fringing vegetation such as Typha are discussed. While the study area supports some preferred habitat features, Mosquito fish (<i>Gambusia holbrooki</i>), a predator of tadpoles, was recorded in Anzac Creek and may occur elsewhere in the study area. Habitat connectivity between marginal potential habitat in the study area and known habitat of the population at Hammondville (3.5 kilometres east of the study area) is low. As a result, the probability of occurrence of the species in the study area was assessed as being unlikely.</p>	Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)
Biodiversity	<p>The following comments relate to the assessment of the Eastern Bent-wing Bat:</p> <ul style="list-style-type: none"> <li>- It is recommended that roosting habitat types other than cave systems are further addressed, particularly given that the assessment acknowledges that “thorough examination of</li> </ul>	<p>No roosts for Eastern Bent-wing Bat were identified from man-made structures although a thorough examination of warehouses and potential roost sites in the SIMTA site was not undertaken; it is possible that roosting habitat for the species occurs in the buildings on the SIMTA site. The Eastern Bentwing-bat is known to roost in man-made structures in Sydney (Threlfall 2011). DEC (2004b)</p>	Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>warehouses and potential roost sites in the SIMTA site was not undertaken”.</p> <ul style="list-style-type: none"> <li>- It is recommended that indirect impacts such as lighting and noise are further addressed, both for the construction and operation phases.</li> </ul>	<p>identifies significant bat roosts as those used for winter, cold weather hibernation and breeding (maternity sites). The buildings on the SIMTA site are not preferred roosting habitat for the species and are not considered to represent significant roosts. Removal of these buildings will not result in loss of important habitat for the long-term survival of this species in the locality.</p> <p>The Eastern Bentwing-bat is tolerant of urban landscapes and may even be able to exploit artificial light sources for foraging; bat species known to forage in open areas can also exploit streetlights for foraging opportunities (Avila-Flores and Fenton 2005), and radio tracking of the related Schreibers’ Bat (<i>Miniopterus schreibersii</i>) in France found that urban areas lit with white street lamps were used extensively for foraging (Vincent et al. 2011). The species may also be impacted by increased levels of noise resulting from the SIMTA proposal; anthropogenic noise has been found to reduce foraging time and effort in some species of bats (Jones 2008, Barber et al. 2009). Given the large areas of foraging habitat available to the species in adjacent suburban areas and remnant bushland, impacts from light and noise as a result of the proposal are unlikely to significantly modify the extent of habitat for this species in the locality.</p>	<p>Consulting, 2013)</p>
<p>Biodiversity</p>	<p>The following comments relate to the assessment of the Southern Myotis and the Eastern Freetail-bat:</p> <ul style="list-style-type: none"> <li>- It is recommend that further justification is provided for the following statement found in Appendix 6 (Assessments of Significance): ‘Approximately seven hollow-bearing trees are located within the proposed rail link will be require removal. This will result in the loss of potential roosting habitat for the Southern Myotis in the study area. This is unlikely to represent a</li> </ul>	<p>This assessment is based on the review of aerial photography and vegetation mapping, which indicates that similar vegetation occurs along the Georges River to the north and south, and to the south-east of the study area in the Holsworthy Military Area.</p> <p>Given the extent of similar riparian vegetation adjoining the Georges River to the north and south of the study area, including areas downslope of the study area, the seven hollow-bearing trees to be impacted are unlikely to represent a significant area of roosting</p>	<p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)</p>



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>significant area of roosting habitat for the species in the locality. ‘</p> <ul style="list-style-type: none"> <li>- It is recommended that indirect impacts are further addressed, particularly given that Figure 12 (Fauna habitat in the study area) indicates that all identified hollow-bearing trees within the study area occur within close proximity to the rail link.</li> </ul>	<p>habitat for the species in the locality.</p> <p>The hollow bearing trees recorded in the study area were mainly on the slope between the Glenfield Waste Disposal site and Georges River. A tall wire fence currently stands between the riparian vegetation and the waste disposal site, which is currently being actively quarried with frequent truck movements across the site. Additionally, the main southern railway line adjoins the north-west of the study area. Given the extent of current impacts, additional indirect impacts from the rail link are considered likely to be minor.</p>	
Hazard and Risk	<p>Still does not make any reference to cumulative risks and hazards, especially those relating to freight transport by both rail and road.</p>	<p>The <i>Traffic and Accessibility Impact Assessment</i> identified existing road traffic performance and future traffic projection to assess the cumulative impacts of the SIMTA proposal. The assessment also included a review of potential impacts on accidents and crashes associated with the SIMTA proposal.</p> <p>As recommended in the Preliminary Hazards and Risks assessment a preliminary hazard assessment would be undertaken as required to comply with State Environmental Planning Policy No. 33 for the subsequent stages of planning approval, once the types of goods associated with each stage have been identified. These assessments would take into consideration the operations of surrounding sites to identify and assess potential cumulative risks and identify mitigation measures.</p> <p>The following statement is included in the Statement of Commitments:</p> <p><i>The Proponent commits to undertaking a preliminary hazard assessment either during the preparation of the detailed applications (where tenants and purposes have been defined) or by tenants during the operational phase of development, as required by State</i></p>	<p>Section 18</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix L <i>Hazards and Risks Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<i>Environmental Planning Policy No. 33 Hazardous and Offensive Development (SEPP No. 33).</i>	2013d)
Hazard and Risk	The rail transport option should consider the risks and hazards associated with additional freight moving within the commuter rail network. This creates potential risks associated with public safety as well as for transport efficiency. Similarly the impacts on the local and broader road networks are not discussed within the revised EA.	<p>The Preliminary Hazards and Risk Assessment takes into consideration the types of goods that maybe transported to the SIMTA site via rail and identifies the standards for design and operational management to mitigate risk associated with handling goods at the SIMTA site.</p> <p>SIMTA considers the Hazards and Risks Assessment to be at the appropriate level of detail for a Concept Plan Approval. This assessment is preliminary by virtue of the planning stage at which it has been conducted. It identifies key issues, establishes relevant criteria, and demonstrates, at a high level, the ability to comply with the criteria.</p> <p>The following statement is included in the Statement of Commitments:</p> <p><i>The Proponent commits to undertaking a preliminary hazard assessment either during the preparation of the detailed applications (where tenants and purposes have been defined) or by tenants during the operational phase of development, as required by State Environmental Planning Policy No. 33 Hazardous and Offensive Development (SEPP No. 33).</i></p>	<p>Section 18</p> <p>Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Appendix L <i>Hazards and Risks Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013d)</p>
Site Contamination	The 2013 EA should require detailed site contamination investigations Phase 2 ESA and Phase 3 Risk assessment be undertaken where required, prior to commencement of construction to delineate the presence and/or extent of soil and groundwater contamination present. Where required, approval would be obtained	A summary of previous land contamination investigations for the SIMTA terminal site has been presented in Appendix M. The <i>Preliminary Environmental Assessment Report</i> recommended a Phase 2 ESA to assess the risk to the detailed design and construction of the rail corridor including a program of soil and groundwater sampling to be completed in accordance with the	<p>Section 18</p> <p>Appendix M <i>Preliminary Environmental Assessment –</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	in accordance with SEPP No. 55 for remedial works.	<p>guidelines made or approved by the EPA under s105 of the <i>Contaminated Land Management Act 1997</i>.</p> <p>As outlined in Section 18 of the EA, SIMTA has committed to undertake a Phase 2 intrusive environmental site assessment for the proposed rail corridor lands according to the recommendation provided in the <i>Preliminary Environmental Assessment Report</i> and the applicable regulation framework and procedures.</p>	<p><i>Rail Corridor Land for SIMTA Moorebank Intermodal Terminal Facility – Part 3A Concept Plan Application</i> (Golder Associates, April 2013a)</p>
Hazard and Risk	<p>Although asbestos has been identified as the main construction risk within the 2013 EA, other contaminants of concern (such as PCBs, Hydrocarbons and chemical waste), previously listed in the 2012 EA should remain identified as risks as they still present a potential hazard and high level of risk to the environment and human health until further detailed investigations can rule out their presence.</p>	<p>The <i>Phase 1 Environmental Site Assessment</i> undertaken by Golder Associates assessed potential ground contamination and identified remediation options in accordance to the guidelines approved under Section 105 of the <i>Contaminated Land Management Act 1997</i>.</p> <p>Asbestos-containing materials, PCB containing materials, unexploded ordnance, radon and other hazardous materials were assessed. Section 7 of the <i>Phase 1 Environmental Assessment</i> (Appendix N) outlines a summary of potential contaminants of concern. Moreover Section 8 identified potential contamination management measures and recommended a Phase 2 intrusive environmental site assessment for the proposed rail corridor lands, and the development of a Contamination Management Plan for the construction phase of the project is included in Section 18 of the EA:</p> <p><i>Developing and implementing a contamination management plan as part of the project construction environmental management plan for managing contaminated materials either expected or unexpectedly encountered during the construction of the rail corridor. The contamination management plan would include detailed procedures on:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;</i></li> </ul>	<p>Section 18</p> <p>Appendix N</p> <p><i>Phase 1 Environmental Site Assessment – Rail Corridor Land for SIMTA Moorebank Intermodal Terminal Facility – Part 3A Concept Plan Application</i> (Golder Associates, April 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<ul style="list-style-type: none"> <li>▪ <i>Assessment, classification and disposal of waste in accordance with relevant legislation; and</i></li> <li>▪ <i>A contingencies plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials that may be encountered during site works.</i></li> <li>▪ <i>Developing a Contamination Management Plan with detailed procedures on:</i> <ul style="list-style-type: none"> <li>▪ <i>Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;</i></li> <li>▪ <i>Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill;</i></li> <li>▪ <i>Assessment, classification and disposal of waste in accordance with relevant legislation; and</i></li> <li>▪ <i>A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works</i></li> </ul> </li> </ul>	
Hazard and Risk	An unexpected finds protocol should be developed for the construction phase to manage potential contamination finds, which should be incorporated in the Construction Environmental Management Plan (CEMP).	<p>As recommended in the <i>Phase 1 Environmental Site Assessment</i> (Appendix N), following the results from the recommended Phase 2 intrusive site assessment, a Contamination Management Plan would be developed for managing contaminated material either expected or unexpectedly encountered during the construction phase of the proposal. As explained in Section 9.3 of the EA, the Contamination Management Plan would include detailed procedures on:</p> <ul style="list-style-type: none"> <li>▪ <i>Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;</i></li> </ul>	<p>Section 9.3 and 18</p> <p>Appendix N <i>Phase 1 Environmental Site Assessment – Rail Corridor Land for SIMTA Moorebank Intermodal</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<ul style="list-style-type: none"> <li>▪ <i>Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill; Assessment, classification and disposal of waste in accordance with relevant legislation; and</i></li> <li>▪ <i>A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works. Other non-asbestos contaminants of concern will be identified in the Phase 2 intrusive environmental site assessment recommended in the Preliminary Environmental Assessment report. This assessment will identify potential soil and water contamination and identify remediation measures for contaminants removal.</i></li> </ul> <p>This Plan would be implemented during construction along with other CEMP procedures.</p>	<p><i>Terminal Facility – Part 3A Concept Plan Application (Golder Associates, April 2013b)</i></p>
Hazard and Risk	<p>Detailed rail network modelling should be undertaken to understand the detailed interactions and potential bottlenecks in the rail system through to Port Botany. This modelling would need to consider the MIT proposal as part of a cumulative assessment.</p> <p><b>Identified as a key issue</b></p>	<p>As noted in the <i>Rail Access Report</i>, operational impacts from the SIMTA proposal will be utilised by ARTC to input into their strategic planning and operational modelling. ARTC's modelling would take into consideration other network users.</p>	<p>Appendix H <i>Rail Access Report – Transitional Part 3A Concept Plan Application (Hyder Consulting, 2013)</i></p>
Contamination	<p>The contamination assessments undertaken to date, are by nature preliminary and do not provide sufficient information to detail the nature and extent of contamination (if any) and the associated remediation required (if any).</p> <p><b>Recommendations</b></p>	<p>The following commitment has been made in the EA (Section 18):</p> <ul style="list-style-type: none"> <li>▪ <i>Undertaking a Phase 2 intrusive environmental site assessment of the proposed rail corridor lands, with an objective to assess the risk posed to the detailed design and construction of the rail corridor by the areas of environmental concern identified within this report. The Phase 2 intrusive investigation would include a</i></li> </ul>	<p>Section 18</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>As a minimum, the applicant must:</p> <ul style="list-style-type: none"> <li>&gt; Undertake further intrusive investigations on both the SIMTA site and SIMTA rail corridor land.</li> <li>&gt; Based on these investigations detail any requirements for remediation, monitoring or other management measures.</li> <li>&gt; Develop a Contamination Management Plan(s) for the SIMTA site and SIMTA rail corridor land, including ongoing management, monitoring, auditing and reporting requirements both during and post construction.</li> </ul>	<p><i>program of soil and groundwater sampling completed in accordance with the guidelines made or approved by the EPA under s 105 of the Contaminated Land Management Act 1997.</i></p> <p>This would commence on approval of the Concept Plan and the outcomes of the investigation would accompany subsequent stages of planning approval.</p>	
Stormwater and flooding	<p>Proposed filling of the site to provide flood immunity has impacts on the Probable Maximum Flood (PMF), with impacts of up to 50mm shown for downstream flood extents. It is recommended that the PMF impacts be further quantified and assessed, in particular in terms of any implications to emergency response planning or the safety of people in accordance with the Floodplain Development Manual (DIPNR, 2005).</p> <p><i>It is recommended that PMF impacts are revised to include implications to emergency response planning and the safety of people both with and surrounding the site.</i></p>	<p>Section 10.3.1 of the EA notes that:</p> <p><i>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 systematic issue where the sites' surface water flow is not the primary contributing factor to flood heights.</i></p> <p>Section 4.1 of the <i>Flood Study and Stormwater Management Report</i> quantifies site runoff and on-site detention requirements. The DRAINS model used identifies that the on-site detention proposed will result in post-development stormwater discharge levels being no greater than under existing conditions.</p> <p>The following statement of commitments is included in the EA:</p> <p><i>The Proponent will prepare and update a flood emergency response plan as necessary to address the staged development of the site. Details are to be provided prior to construction of each of the three major stages of the development</i></p>	<p>Sections 10.3.1 and 18</p> <p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Stormwater and flooding	<p>The flood maps provided for the review are of low resolution. Legible copies of the reports are required to perform a thorough assessment.</p> <p><i>It is recommended that high resolution figures and designs are provided in order to provide enough information to allow an assessment to be made.</i></p>	<p>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 Stormwater Management appendices that show the mapping and modelling results have been attached as an appendix to the Submissions Report.</p>	Submissions Report
Stormwater and flooding	<p>The PMF impacts map should be extended to incorporate the full extent of downstream impacts.</p> <p>The PMF impact map should be amended to include a “was dry now wet” parameter, which would be valuable in assessing whether any properties may anticipate further flood affectation as a result of the proposal.</p> <p><i>It is recommended that the PMF impacts map is updated to include the full extent of downstream impacts as well a “was dry now wet” parameter.</i></p>	<p>Section 10.3.1 of the EA notes that:</p> <p><i>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 systematic issue where the sites’ surface water flow is not the primary contributing factor to flood heights.</i></p> <p>Section 4.1 of the <i>Flood Study and Stormwater Management Report</i> quantifies site runoff and on-site detention requirements. The DRAINS model used identifies that the on-site detention proposed will result in post-development stormwater discharge levels being no greater than under existing conditions.</p> <p>The PMF scenario was assessed to identify potential changes in the flooding regime. Appendix E to the <i>Flood Study and Stormwater Management Report</i> outlines results of the 100 year ARI nine-hour event and PMF nine hour event. The PMF one hour event model has also been assessed in TUFLOW using DRAINS and adjusted RAFTS hydrograph inputs. In addition, potential Climate Change flow regimes have been included in the 100 year ARI and PMF event assessments. Mapping showing the changes between the existing and proposed conditions during the PMF event were included in Appendix E to the <i>Stormwater and Flooding Report</i>. High resolution mapping outputs from the flood assessment have been included with this Submissions Report, which show the changes</p>	<p>Sections 10.3.1 and 18</p> <p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		between the existing and proposed conditions during the PMF.	
Stormwater and flooding	<p>Off-site impacts of impediment / diversion of existing catchments should be qualified to demonstrate the effectiveness of the proposed mitigation measures.</p> <p><i>It is recommended that off-site impacts are discussed to ensure appropriate mitigation measures are employed.</i></p>	<p>A discussion of off-site impacts is provided in the <i>Flood Study and Stormwater Management</i>. As the area to the south of the SIMTA site is largely undeveloped there is little current implication for increased flooding in this area.</p> <p>Civil design drawings showing the proposed location of on-site detention and the accompanying report, <i>Flood Study and Stormwater Management</i> 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. The current commitment, as follows, is considered appropriate to mitigate potential flood impacts:</p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases, prior to commencement of relevant phase.</i></li> <li>▪ <i>Implementation of management plan strategies prior to commencement of the staged construction phase.</i></li> <li>▪ <i>Monitoring and review performance of sediment and water control structures during construction and operation phases, ,</i></li> </ul>	Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<i>prior to commencement of relevant phase.</i>	
Stormwater and flooding	The DGRs require the proponent to undertake an appropriate level of consultation with relevant parties, including adjoining and affected landowners. While the assessment indicates that adverse impacts resulting from the management of external catchments 'may be open to negotiation with the various stakeholders', there is no evidence of such negotiation or consultation having taken place. If impacts are anticipated consultation with affected landowners (as per DGRs) will be appropriate.	The consultation undertaken by SIMTA, which includes consultation with the Commonwealth, who is the landholder in question. The following statements of commitment is included in the EA:  <i>The Proponent will continue to consult with the relevant government authorities and bodies during the design development process for the detailed applications for the three major stages of the development.</i>	Sections 17 and 18
Stormwater and flooding	The stormwater and flooding assessment is only based on the SIMTA site and does not consider the impact of the proposed railway that would link the site to the existing rail network. Flooding in this rail corridor can potentially impact upon rail safety, access, and ecological values. In order to ensure that the impacts of this development are completely assessed the impacts of flooding on the new rail line requires consideration.  <i>It is recommended that the proposed works within the railway corridor are assessed to determine the stormwater and flood impacts of these works.</i>	Mapping of the extent of flood impacts is provided in Appendix P: <i>Flood Study and Stormwater Management.</i>  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:  <i>The Proponent will prepare and update a flood emergency response plan as necessary to address the staged development of the site. Details are to be provided prior to the construction of each of the three major stages of the development.</i>  Section 6.2 of the <i>Flood Study and Stormwater Management</i> outlines the potential flooding risk and impacts associated with the proposed rail link. Section 6.2.1 concludes that:  <i>The proposed [rail] link alignment along the western floodplain of the Georges River does not impact on the 100 year ARI Georges River flooding levels.</i>	Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Stormwater and flooding	<p>The specific design and location of pre-treatment and bio-retention systems has not been identified. This detail is required in order to determine if the proposed mitigation measures are adequate for the project catchment and project impacts of the proposal. Should these systems not be appropriately designed or lack capacity, then downstream water quality impacts would occur within environmentally sensitive waterways and associated riparian corridors.</p> <p><i>It is recommended that specific mitigation measures, as well as the location and design details of proposed pre-treatment and bio-retention systems, be included to ensure that the proposal can be assessed to determine if measure presented are adequate and suitable.</i></p>	<p>The <i>Flood Study and Stormwater Management</i> Report contains indicative design and location details of pre-treatment and bio-retention systems to be implemented as flood and stormwater mitigation measures. Figure C1 within Appendix C: <i>Music Model Layout and Parameters</i> to this report provides a model layout including indicative locations for pre-treatment and bio-retention systems to be used on site. Table C3 provides key parameter values and designs for Gross Pollutant Traps and Bio-retention systems applied within the MUSIC modelling.</p> <p>The <i>Flood Study and Stormwater Management</i> appendices, including Appendix C, have been attached as an appendix to the Submission Report in high resolution, to more clearly show the mapping and modelling results.</p>	<p>Submissions Report</p> <p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>
Stormwater and flooding	<p>There is a lack of consideration of the required stormwater and waste water treatment infrastructure within the 2013 EA. An example includes the requirement within Part 1.1 of the Liverpool DCP 2008 associated with Gross Pollutant Traps (GPTs). GPT's are required for development of industrial land, however, no consideration is provided.</p> <p><i>It is recommended that consideration of the Liverpool DCP's stormwater infrastructure requirements is included in the proposal.</i></p>	<p>Section 2.5.2 of the EA outlines the key built form controls proposed for the siting, layout and design of the future development of the site, and includes:</p> <p><i>Water Sensitive Urban Design (WSUD) - a number of WSUD measures are proposed to achieve treatment targets, including rainwater tanks, buffer strips, gross pollutant traps, bio-retention systems / rain gardens (eco corridor) and bio swales.</i></p> <p>It is noted as a proposed management and mitigation measure within section 10.3.1 of the EA that all rainwater tanks used on site would have a first-flush device to capture gross pollutants and sediments accumulating on the roof.</p> <p>The <i>Flood Study and Stormwater Management</i> Report includes information on the stormwater quality measures which have been proposed to be implemented as part of the SIMTA proposal to meet the identified treatment targets. Section 4.1.2.2 of the report notes</p>	<p>Sections 2.5.2 and 10.3.1</p> <p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>that Gross Pollutant Traps (GPTs) are proposed as a stormwater quality measure. Section 4.1.2.4 of the Report assesses the treatment performance for individual catchments and the whole site as a result of the proposed stormwater quality measures. It states that:</p> <p><i>In summary, the water quality assessment methodology and treatment performance of the proposed WSUD measures is understood to comply with the treatment targets according to the Liverpool Development Control Plan (2008).</i></p> <p>Table 7 provides a performance summary for the site, showing that Gross Pollutants are expected to reduce by 100% for each of the catchments and for the total site (compared with a 90% treatment target).</p>	
Stormwater and flooding	<p>Management and mitigation measures described in the revised EA are ill-defined and general, providing only a vague understanding of the measures proposed to be used to address impacts. Specific details of the mitigation measures proposed including: details of site levels; drainage grades; sediment and erosion control strategies; and the chosen light penetrating design materials would assist in more accurately defining the measures and whether they are suitable and adequate to address potential impacts.</p>	<p>Section 4 of the <i>Stormwater and Flooding Environmental Assessment</i> report outlines management and control / mitigation measures for both the construction and operation phases of the SIMTA proposal.</p> <p>The following statements of commitment are included in the EA:</p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.</i></li> </ul> <p><i>The Proponent will implement the following measures to protect the aquatic flora and fauna as part of the applications for the detailed</i></p>	<p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>planning applications (where relevant and applicable):</i></p> <ul style="list-style-type: none"> <li>▪ <i>Implementation of design principles for fish friendly passage.</i></li> </ul> <p>The ultimate design of the rail bridge and selection of materials would be confirmed during development of detailed design and assessed in accordance with the assessment requirements established by DP&amp;I.</p>	
Stormwater and flooding	<p>The original and revised EA assume that there would not be cumulative impacts resulting from the development and operation of both the SIMTA and MIT proposals due to strict design and statutory considerations. This is a broad assumption, lacking supporting evidence. The MIT EA has not yet been publicly exhibited. Consequently, the measures proposed to be used to manage stormwater are not known and the extent of cumulative impact cannot be quantified. A more appropriate approach to considering cumulative impacts associated with stormwater would be for the SIMTA and MIT proponents to undertake extensive upfront liaison to establish potential synergies, which could lead to reduced environmental impacts, along with rationalizing the extent of service infrastructure required to meet the demand for the two adjacent sites. A coordinated approach would help to reduce resource consumption and increase efficiencies during both construction and operation. The potential cumulative impacts could then be assessed accurately, with a conservative approach taken, in order to provide a realistic understanding of the impacts.</p> <p><i>It is recommended that a coordinated development and operational approach be used, with extensive liaison undertaken between SIMTA and MIT prior to preparing revised approvals documentation. A coordinated approach would allow cumulative impacts to be accurately identified, with development and operational efficiencies more likely to be realised.</i></p>	<p>The Community Information Boards (MIC 2013) have been reviewed and it was concluded that, as noted in Section 6.1.6 of the <i>Flood Study and Stormwater Management Report</i>, insufficient details of the proposal bridge to the MICL proposal are available to quantify the potential flood impacts associated with the proposal.</p> <p>SIMTA's approach has been to identify design principles that would be adopted for the George's River Railway bridge to minimise impacts associated with the SIMTA proposal, as identified in the <i>Flood Study and Stormwater Management Report</i>.</p> <p>Further, the following Statement of Commitments will address the management of potential stormwater impacts:</p> <p><i>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:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.</i></li> <li>▪ <i>Implementation of management plan strategies prior to commencement of the staged construction phase.</i></li> <li>▪ <i>Monitoring and review performance of sediment and water</i></li> </ul>	<p>Section 10.3.2</p> <p>Submissions Report</p> <p>Appendix P <i>Flood Study and Stormwater Management – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013g)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>control structures during construction and operation phases.</i></p> <p>And</p> <p><i>The Proponent will prepare and update a flood emergency response plan as necessary to address the staged development of the site. Details are to be provided prior to the construction of each of the three major stages of the development.</i></p>	
Air quality	<p>Clarification is required as to whether there will be any refrigerated or frozen materials handling and storage. No emissions related to refrigeration have been considered, and if refrigeration is proposed this is required.</p> <p>Clarification is required as to whether there will there be any space heating of warehouses. No on site fuel consumption for space heating of warehouses or offices has been considered.</p> <p><i>It is recommended that any project approval should not allow for storage or handling of refrigerated or frozen materials or for any odorous materials, since these activities have not been included within the scope of the EIS.</i></p> <p><i>It is recommended that any project approval should not allow for space heating, since these activities have not been included within the scope of the EIS.</i></p>	<p>It has not been envisaged at this stage that refrigerated or frozen material will require handling or storage on site, however should refrigeration or frozen material storage be proposed this would be assessed in air quality assessment for subsequent planning assessment stages.</p> <p>It is not expected that warehouses will require space heating using on-site fuel consumption.</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.</p>	Appendix Q <i>Air Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)
	<p>No information has been provided in relation to the model inputs for the dispersion model (emission sources, emission characteristics and physical characteristics of the receiving environment); therefore technical adequacy of existing modelling cannot be fully evaluated. Ground level concentrations at sensitive receptors may be underestimated.</p> <p><i>It is recommended that technical details of the dispersion model</i></p>	<p>Section 4 of the <i>Air Quality Impact Assessment</i> clearly provides detailed information on the physical characteristics of the receiving environment. Appendix A of the <i>Air Quality Impact Assessment</i> presents an analysis of the meteorological inputs to the model. The emission sources and emission characteristics are clearly described in Section 5.2 and 5.3. These sections are sufficient to allow a technical review of the model inputs. Model settings are as described in the Approved Methods which is reported in Section 4 of</p>	Appendix Q <i>Air Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment,

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p><i>inputs are required so that the assumptions made in the modelling can be reviewed.</i></p>	<p>the <i>Air Quality Impact Assessment</i>.</p> <p>The <i>Air Quality Impact Assessment</i> uses an atmospheric dispersion 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 have been used to characterise and describe the dispersion characteristics of the Liverpool area. The predicted impacts from the project take into account the nature of Liverpool area, including the influence that local drainage has on dispersion.</p> <p>Additional clarification on modelled data and results may be provided on a needs basis upon request to SIMTA.</p>	<p>2013)</p>
	<p>Air quality impacts will be under-estimated, if, as identified by the review of the traffic assessment, the traffic movements associated with the facility have been under-estimated. The Traffic Assessment undertaken by Cardno considered the traffic movements to be substantially above those identified in both the 2012 and 2013 EAs, with air quality impacts correspondingly higher.</p>	<p>The <i>Transport and Accessibility Impact Assessment</i> includes additional information on traffic modelling and trip generation data. Section 6.5 of the report outlines the validation of truck generation modelled. Section 6.6 of the report discusses sensitivity testing carried out around key assumptions.</p> <p>Furthermore, 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</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></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>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>The <i>Air Quality Impact Assessment</i> for the SIMTA proposal was updated by Pacific Environment (former PAE Holmes) to include additional information available and updated traffic modelling (as presented in <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i>).</p>	<p>(Hyder Consulting, June 2013a)</p> <p>Appendix Q <i>Air Quality impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)</p>
	<p>The revised EA identifies the key pollutants associated with both the construction and operational phase of the SIMTA proposal, however no impact assessment of several of these pollutants has been undertaken. In particular no assessment of ozone and VOCs has been included.</p> <p><i>It is recommended that an impact assessment for ozone and VOCs is required as these pollutants have not been adequately assessed.</i></p>	<p>The <i>Air Quality Impact Assessment</i> includes information on design refinements and understanding of site operations.</p> <p>Ozone is a secondary pollutant (not emitted directly but formed in the atmosphere due to emissions of ozone precursors). Ozone is the principal component of photochemical smog and typically assessed for impact on at the regional airshed level, not as a local air pollutant. The air quality impacts at the regional level have been considered in Section 8 of the <i>Air Quality Impact Assessment</i> and the proposal was found to results in a decrease in ozone precursors at the regional level with no negative impact on regional air quality.</p> <p>Volatile Organic Compounds (VOC) are discussed in Section 3.5 of this report, and it is concluded that:</p> <p><i>It is unlikely that any significant impacts would arise due to VOC emissions from the site, given the buffer distances from significant activity to receptor locations.</i></p>	<p>Section 11.3</p> <p>Appendix Q <i>Air Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)</p>
	<p>Given that the background levels of some pollutants are already high,</p>	<p>The incremental increase in local pollution from the SIMTA proposal</p>	<p>Appendix Q <i>Air</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>although the addition of emissions from the SIMTA terminal will not cause criteria to be exceeded, the proposal will reduce available headroom for new industry or other emission sources to enter the area, possibly restricting future development. A discussion of this issue is required, particularly in respect of cumulative impacts and the proposed MIT facility. Additional data presented in the revised Air Quality Impact Assessment (Pacific Environment Limited, 2013) for the years 2007 to 2012 shows that 2009 (referenced in our previous review) had particularly high background levels and is not representative of the other years.</p>	<p>is predicted to be relatively minor (for example annual average increase in PM<sub>10</sub> is 1% of the goal) and therefore will not significantly “reduce available headroom” for other emissions sources.</p> <p>The use of 2009, with high background levels, is a conservative approach as it assumes less “available headroom” for SIMTA. During other more typical years the cumulative impacts would be less than presented.</p> <p>The cumulative impact on air quality of the full SIMTA site operations (the proposal) or combined operations with the proposed MICL intermodal proposal has been assessed within Section 6.5 of the <i>Air Quality Impact Assessment</i> and Section 11.3.3 of the EA. 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 similar.</p> <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 cumulative impact assessments in the EA and specialist studies accordingly.</p> <p>Section 8 of the <i>Air Quality Impact Assessment</i> outlines the potential impact of the SIMTA proposal on regional air quality, concluding that the impacts on regional air quality will be negligible.</p>	<p><i>Quality Impact Assessment – Impact Assessment Report</i> (Pacific Environment, 2013)</p> <p>Submissions Report</p>
	<p>The Air Quality Assessment is based on a combined capacity of 1 million TEUs spread across the SIMTA and MIT facilities. It is therefore considered appropriate that this is represented in any approval condition with an upper limit being placed on the total</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</p>	<p>Appendix Q <i>Air Quality Impact Assessment – Impact</i></p>



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>throughput of the two facilities in combination. Alternatively, assessment of the realistic throughput should be undertaken.</p> <p><b>Identified as a key issue</b></p>	<p>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. The cumulative impact of the full SIMTA site operations or combined operations with the proposed MICL intermodal proposal has been assessed, taking into account the freight catchment demand of one million TEU. The locations of the sources of air emissions would change if the demand was shared between the two sites, however, the overall scale of impact would be similar.</p> <p>Since the preparation of the SIMTA Air Quality Impact Assessment MICL have released additional information, including a factsheet on air quality. The factsheet summarises emissions estimates for MICL and provides a descriptive summary of results. The emissions estimates presented for the MICL are similar to SIMTA for PM<sub>10</sub> but are higher than SIMTA for NO<sub>x</sub>. It is not clear what emission factors or activity data were used for MICL so the difference cannot be explained at this time, however the conclusions presented within the MICL information boards, relating to air quality impact from the MICL site, appear similar to the SIMTA Air Quality Impact Assessment, that is, a relative low risk of impact.</p> <p>The MICL fact sheet reports no additional exceedances of PM<sub>10</sub> and PM<sub>2.5</sub>. There are exceedances reported for formaldehyde; however, this is expected to be a result of the assumptions used in the assessment and would require further interrogation. It is noted that ambient concentrations of formaldehyde would not be expected to</p>	<p><i>Assessment Report</i> (Pacific Environment, 2013)</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, August 2013a)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		exceed air quality goals, even close to busy roadways.	
Greenhouse gas	<p>GHG impacts in the rail corridor have had no substantial consideration and should be assessed.</p> <p><i>It is recommended that activities in the rail corridor, including vegetation clearance should be documented and fully assessed.</i></p>	<p>Operational greenhouse gas emissions have been assessed and calculated in Appendix R of the EA including freight transport emissions. The report concluded that the "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 (91 TEU) by a single train journey as opposed to a single truck journey (2 TEU)."</p> <p>Additionally, cleared vegetation emissions were calculated as part of the Site Preparation section leading to an estimate of 127 t CO<sub>2</sub>-e (refer to Appendix R).</p>	Appendix R <i>Greenhouse Gas Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013h).
Greenhouse gas	<p>Calculations throughout the document are not substantiated and it is impossible to verify the quantified emissions presented. The report should include (likely as an appendix) details of all calculations undertaken in a spreadsheet file, which is required to be submitted and made publicly available.</p> <p><i>It is recommended that a collated set of assumptions used in the air quality, noise and vibration, GHG and traffic reports should be provided. Where different input data has been used, this should be documented, and a justification made as to why the assessments undertaken can be relied upon when determining the magnitude of impacts.</i></p> <p><i>Additional data should be provided which enables the data presented to be verified. In particular, model input data and assumptions should be provided, ideally in spread sheet format.</i></p>	<p>Data used for the calculations in the <i>Greenhouse Gas Assessment</i> (Appendix R) have been provided throughout the report. Volumes, units and assumptions considered for the quantum of t CO<sub>2</sub>-e emissions have been detailed in the following sections of the <i>Greenhouse Gas Assessment</i> as appropriate: Section 2 Construction Based GHG Inventory; Section 3 Embodied Emissions of Materials; Section 4 Operational Greenhouse Gas Emissions; and Section 5 Freight Transport Operations.</p> <p>Each of the above sections present a table detailing the specifications for each type of emissions source and a table on the assumptions considered for each source of emissions. For instance, the following details are provided for the site preparations works:</p> <ul style="list-style-type: none"> <li>▪ Table 10: Specifications for machines/vehicles used during earthworks, drainage and utilities installations (Machine and</li> </ul>	Appendix R <i>Greenhouse Gas Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013h).

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>model required, capacity, fuel tank capacity)</p> <ul style="list-style-type: none"> <li>▪ Table 11: Summary of assumptions for machinery use associated with earthworks, drainage and utilities (estimated works days, estimated fuel use, fuel type)</li> </ul> <p>This information is considered sufficient for verification purposes. Further information may be provided on request to SIMTA.</p>	
Greenhouse gas	Vegetation clearance is considered only in terms of decomposition of cleared grass at a composting facility. No consideration is given to the long term land use change.	The <i>Greenhouse Gas Assessment</i> (GHG Assessment) has been prepared in accordance to the Director General Requirements. The scope and quantum of emissions from each source is based in the factors and methods outlined the <i>National Greenhouse Accounts (NGA) Factors</i> published by the Australian Government Department of Climate Change and Energy Efficiency (2009). The quantum of land-use change has not been required by the DGRs nor detailed in the NGA Factors.	Appendix R <i>Greenhouse Gas Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013h).
Greenhouse gas	<p>No assessment of the potential for onsite renewable energy generation to offset the project GHG emissions is provided.</p> <p><i>It is recommended that consideration be given to an approval condition requiring a percentage of the site's electricity power needs to be generated from renewable sources on site, or to require a feasibility study on this subject.</i></p>	<p>SIMTA considers the greenhouse gas assessment to be at the appropriate level of detail for a Concept Plan Approval. This assessment is preliminary by virtue of the planning stage at which it has been conducted.</p> <p>As outlined in Section 18 of the EA, SIMTA has committed to the preparation of a <i>Greenhouse Gas Management Plan</i> for the operation of the three major stages of the development in accordance with the provisions of the Greenhouse Gas Assessment (Appendix R). These provisions include the investigation of the feasibility of on-site renewable energy generation once the project details are progressed.</p>	Section 18  Appendix R <i>Greenhouse Gas Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
			2013h).
Greenhouse gas	<p>Whilst the revised EA recommends appropriate actions for the mitigation of GHG emissions during the operation of the facility the assessment does not consider explicitly the potential for offsetting of emissions.</p>	<p>The GHG assessment sought to compare the SIMTA Intermodal Terminal Facility with a potential redevelopment of the site in accordance with the <i>Liverpool Local Environmental Plan 2008</i>. This comparison has demonstrated that the SIMTA proposal can achieve an annual GHG saving of 43,206 tCO<sub>2</sub>e per annum through its operational and transport efficiencies.</p> <p>Section 11.3.2 of the EA identifies the measures that have been recommended to minimise greenhouse gas emissions during the construction and operation of the terminal, and the embedded emissions associated with construction materials. SIMTA has committed to the implementation of a <i>Greenhouse Gas Management Plan</i> that would detail offsetting emissions during the operation of the facility such as the inclusion of electrically powered container handling equipment in lieu of diesel equipment and use of locomotives with automatic shut-down/restart when idling for extended periods.</p>	<p>Section 11.3.2</p> <p>Appendix R <i>Greenhouse Gas Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, June 2013h).</p>
Non Indigenous Heritage	<p>The NIHA does not “<i>detail how any impacts on items of (indigenous and) non-indigenous heritage would be addressed and managed as part of the subsequent projects stages</i>” (DP&amp;I, 2010, Director-General’s Requirements), as required by the DGRs. In this way the NIHA and associated EA section do not currently meet the DGRs</p> <p><i>It is recommended that the Non-indigenous Heritage Assessment and associated EA section be revised and updated to meet the DGRs, specifically, the Assessment is lacking:</i></p> <ul style="list-style-type: none"> <li>- <i>A description of how the items of heritage would be addressed and managed as part of the subsequent project stages</i></li> </ul>	<p>The EA includes an assessment of potential impacts to non-indigenous heritage items in Section 12.3.2. Section 12.3.2 and Table 8 of the EA also include recommendations and mitigation measures to manage non-indigenous heritage impacts.</p> <p>The <i>Non-Indigenous Heritage Assessment</i> assesses potential impacts to non-indigenous heritage in Section 7. Sections 7 and 9 of the <i>Non-Indigenous Heritage Assessment</i> outline mitigation measures for managing heritage impacts.</p> <p>It should be noted that potential impacts to heritage as a result of the SIMTA proposal have not yet been finalised and as such the impact assessment is preliminary. Notwithstanding this the</p>	<p>Section 12.3.2 and Section 18</p> <p>Appendix T <i>Non-Indigenous Heritage Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Artefact, June</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>- <i>An appropriate assessment of the potential impacts.</i></p>	<p>assessment provided is considered consistent with, and therefore satisfies the DGRs for the proposal. More detailed assessment of heritage impacts and further development of mitigation measures would be undertaken at subsequent planning assessment stages as shown in Section 18 of the EA.</p>	<p>2013).</p>
<p>Non Indigenous Heritage</p>	<p>Considering the potential implications of the works on items of Commonwealth heritage significance in the area consultation with the relevant Commonwealth body is required. Consultation should entail discussion of mitigation and management of the heritage items along with the submission of a Commonwealth EIS to the Minister for Sustainability, Environment, Water, Population and Communities for approval. Such consultation has not been documented in either the EA or the NIHA. The 2013 EA states in Section 17.1 that a draft EPBC Act EIS was placed on public display in June 2013 (Urbis, [a], 2013). A copy of the draft EPBC Act EIS was not publically available at the time of this review and so the content of the EIS could not be commented on.</p> <p><i>It is recommended that consultation with the relevant Commonwealth heritage body be undertaken to ensure appropriate management and mitigation measures are included in the EA to minimise loss of the heritage significance at this location. If this has already been undertaken then it should be included within the relevant sections of the EA.</i></p>	<p>The Final EPBC Act EIS has been submitted to the Department of Environment and was on exhibition from 19 June to 13 August 2013 in electronic and hard copy formats, including a hard copy version located at Liverpool City Council. Liverpool City Council provided comments on the Draft EPBC Act EIS during this exhibition period. The finalised EPBC Act EIS has been on display since 10 October 2013 in electronic and hard copy formats, including a hard copy version located at Liverpool City Library.</p>	<p>N/A</p>
<p>Non Indigenous Heritage</p>	<p>The discontinuation of military use, the proposed new use and demolition of built elements would have a major adverse impact on the heritage significance of the site. The site is a highly significant heritage place particularly with respect to the group of 18 World War II buildings that are very rare and are the only known surviving group of such buildings in NSW in Defence use. Therefore, these buildings should continue to be protected through heritage listing on the State</p>	<p>Potential impacts to the heritage values of the DNSDC site have been assessed. Recommendations regarding the potential listing of the DNSDC site on the NHL or SHR are provided in Section 9 of the <i>Non-Indigenous Heritage Assessment</i> (Appendix T) and 12.3.2 of the EA. Further investigations will be undertaken as part of subsequent stages of planning approval.</p>	<p>Section 12.3.2  Appendix T <i>Non-Indigenous Heritage Assessment – Environmental</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	Heritage Register and within the Liverpool Local Environmental Plan 2008 for their heritage values for past and future generations. Council has commenced the process to nominate the site for the State Heritage Register and list the site in Schedule 4 of the Liverpool Local Environmental Plan 2008 (Council resolution from 25 September 2013).		<i>Assessment Transitional Part 3A Concept Plan Application</i> (Artefact, June 2013).
Non Indigenous Heritage	<p><b>Recommendations:</b></p> <ul style="list-style-type: none"> <li>- <i>Photographic archival recording in accordance with the Heritage Division guidelines should be undertaken prior to any works on site.</i></li> <li>- <i>Any additional structures on site must be sympathetic to historic elements in form, scale, bulk, materials and colours but be readily identifiable as new development.</i></li> <li>- <i>Additional archaeological investigation should be undertaken in those areas highlighted as potentially containing significant deposits.</i></li> <li>- <i>A comprehensive interpretation strategy is required to communicate the history of the site to users.</i></li> <li>- <i>A landscape plan must be developed to reduce adverse impacts on neighbouring heritage items.</i></li> </ul>	<p>The Statement of Commitments in Section 18 of the EA includes the development of a mitigation strategy for the DNSDC site as per the recommendations in Table 3 of the <i>Non-Indigenous Heritage Assessment</i>. Table 3 includes the undertaking of a photographic archival recording and architectural interpretation to reflect the heritage values of the site in the design and construction of new structures. It also includes the undertaking of additional archaeological investigations where subsurface investigations are occurring in areas of archaeological potential.</p> <p>Section 7.2.5 of the <i>Non-Indigenous Heritage Assessment</i> (Appendix T) addresses landscaping to reduce impacts on neighbouring Glenfield Farm through the establishment of a landscaping 'buffer zone' along Moorebank Avenue, which would include screening vegetation with dense tree canopy cover.</p>	Section 18  Appendix T <i>Non-Indigenous Heritage Assessment – Environmental Assessment Transitional Part 3A Concept Plan Application</i> (Artefact, June 2013).
Indigenous Heritage	A review of the ACHA and relevant information sources has identified that prior to the submission of the revised EA, 9 additional sites were registered on the Aboriginal Heritage Information Management System (AHIMS) adjacent to the proposed site, which have not been recognised in the ACHA. These sites, identified as 45-5-4273, 45-5-4274, 45-5-4275, 45-5-4276, 45-5-4277, 45-5-4278, 45-5-4279, 45-5-4282 and 45-5- 4283, were identified during heritage investigations of	It is noted that these sites are outside of the SIMTA proposal site and are unlikely to be impacted. Notwithstanding this, an updated figure and assessment are included in the Submissions Report.	Submissions Report

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>the neighbouring Moorebank Intermodal Terminal Project and were registered with AHIMS on the 03/04/2013. These sites are shown in Figure 4-2 below. Due the recent discovery of these sites, the ACHA should be revisited in order to ensure that the Aboriginal significance of the location is adequately assessed.</p>		
Indigenous Heritage	<p>The SIMTA rail corridor area changed between the original and revised EA's however, the ACHA does not mention this change in text and did not undertake additional surveys in order to determine if the change in the proposal footprint would result in any additional impacts on items of places of Aboriginal significance. The ACHA needs to be revised in order to ensure that it provides an adequate assessment of the proposal area and entirely assesses the heritage impacts of this proposal.</p>	<p>The additional area of impact within the SIMTA rail corridor that was not assessed in the <i>Aboriginal Cultural Heritage Assessment</i> (ACHA) was the riparian zone of the Georges River referred to as Area 1. Area 1 will be assessed as part of subsequent stages of planning approval. The Statement of Commitments have been updated to reflect this additional area for assessment, namely:</p> <p><i>Where the detailed design of the rail link would result in disturbance to a potential archaeological deposit or an area of potential archaeological value the detailed application for that stage of works shall include test excavations in those areas that may be disturbed in accordance with current archaeological practice and any relevant guidelines to determine the nature, extent and significance of any Aboriginal archaeological deposit. Such testing would be undertaken under Section 75U of the Environmental Planning and Assessment Act 1979, and be used to inform the assessment of these areas prior to lodgement of the subsequent staged application.</i></p>	<p>Submissions Report</p> <p>Appendix S <i>Aboriginal Cultural Heritage Assessment –Part 3A Concept Application</i> (Artefact, November 2012).</p>
Indigenous Heritage	<p>The ACHA outlines that seven Aboriginal artefacts and three areas of Potential Archaeological Deposits (PADs) were identified within the study area during the detailed site surveys. Two of the PADs are located within areas which will be impacts by the proposed rail road. These PADs need to undergo detailed surveys including test pits in order to determine if the proposed railroad will impact upon items of Aboriginal significance.</p>	<p>The ACHA (Section 13.2) recommends the undertaking of test pit excavations in areas where works are occurring where there is <i>potential for archaeological deposits or in areas of potential archaeological value</i>. This is also included in the Statement of Commitments in the EA.</p>	<p>Section 18</p> <p>Appendix S <i>Aboriginal Cultural Heritage Assessment –Part 3A Concept Application</i> (Artefact,</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
			November 2012).
Indigenous Heritage	The SIMTA site was not completely surveyed as part of the ACHA. The ACHA did however review the SIMTA site and identified that some areas within the complex have potential for archaeological significance and so investigation of these areas is need to understand in order for the impacts of works to be identified.	The SIMTA site was assessed in the ACHA (Section 12.1 and 13) as having a low likelihood of archaeological material and subsequent low potential for impacts to occur. Mitigation measures are provided to manage any unexpected finds at the site.	Appendix S <i>Aboriginal Cultural Heritage Assessment –Part 3A Concept Application</i> (Artefact, November 2012).
Indigenous Heritage	The ACHA also notes that Aboriginal consultation is currently being undertaken which has not been included in this report and may result in the identification of objects of significance within the SIMTA site. The impacts of this proposal in regards to Indigenous heritage cannot be determined with an incomplete ACHA which does not fully assess the impact area of the proposal and the consequence of this proposal on objects of places of heritage significance. A complete ACHA of the site should be undertaken prior to a determination of this project.	Consultation between SIMTA and relevant Registered Aboriginal Parties (RAPs) is on-going. It would be maintained throughout the design and construction of the SIMTA proposal as stated in the Statement of Commitments (refer to Section 18). If any additional heritage items are identified at the SIMTA site by RAPs, they will be addressed in subsequent stages of planning approval.	Section 13 and 18  Appendix S <i>Aboriginal Cultural Heritage Assessment –Part 3A Concept Application</i> (Artefact, November 2012).
Visual and Urban Design	The identified viewpoints are located a minimum distance of 350 m from the site, with potentially unobstructed views, creating a potentially high level of visual impact.	Section 02.1 of the <i>Visual Impact Assessment</i> outlines the methodology used by Reid Campbell for determining viewpoints to assess for potential visual impact. A preliminary view shed analysis was undertaken by Hyder Consulting to provide an initial indication of which parts of the surrounding area that could potentially view some part of the site. A site inspection was carried out to verify results of the view shed analysis and to specifically identify locations that would potentially be subject to visual impacts from the proposed development. Ground surface data used for the analysis included the natural terrain as well as buildings and major areas of	Appendix U <i>Visual Impact Assessment – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>vegetation.</p> <p>Identified viewpoints have therefore been considered appropriate to assess the visual impacts associated with the project. In addition the nearest residential property is located 400 m to the South East of the site within Wattle Grove. As there are no residential receivers within 350 m the identified viewpoints are appropriate to assess the visual impacts associated with the proposal.</p>	
Visual and Urban Design	<p>The statement that the proposal would result in like for like infrastructure replacement is inaccurate as the site currently accommodates hardstand, warehousing and a large number of camouflaged military trucks. The proposal would include warehousing, gantry cranes, container storage and movement via truck and train, with the intermodal component of the facility comprising rail sidings, gantry cranes and container stacking, which would be located in proximity to the north and east site boundaries.</p>	<p>Section 13.3.1 of the EA states:</p> <p><i>The [Visual Impact] assessment concludes that the proposed development would generally be in keeping with the existing character of the area. Some structures/equipment may increase the visibility of the site beyond its current levels, however the pattern of some of the adjoining development will screen the development from much of the surrounding area. The most prominent views would occur at localised boundary points such as Moorebank Avenue and Anzac Road, as well as the residential boundary to Wattle Grove. However, these impacts are regarded as relatively low because of their existing and unobstructed views of the DNSDC operations which a reasonably compatible with the proposed SIMTA development.</i></p> <p>Figure 10 of the EA shows the concept plan land uses proposed at the SITMA site. The proposed intermodal terminal component of the SIMTA proposal is located within the western portion of the site, adjacent to Moorebank Avenue. Views to the intermodal portion of the site would therefore be from Moorebank Avenue.</p> <p>Table 9 outlines the potential visual impacts of the proposal as identified in the <i>Visual Impact Assessment</i> (Reid Campbell, 2013). 40 key locations within the surrounding area were assessed for</p>	<p>Section 13.3.1</p> <p>Appendix U <i>Visual Impact Assessment – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>visual impact. Mitigation measures to reduce the visual impact are outlined in Section 13.3.1 of the EA. The assessment concludes that:</p> <p><i>The proposed landscape treatments would reduce the visibility of the development and improve the overall visual amenity of the site and locality.</i></p>	
Visual and Urban Design	<p>The visual prominence of the proposal is clearly illustrated by the Urban Design and Landscape Report (Reid Campbell, June 2013) cover picture. Consequently, a far higher visual impact than currently exists would be created. Appropriate mitigation measures including the limiting of container stacking heights and visual screening through the use of extensive planting of mature trees along the corresponding boundaries is required to reduce the potential visual impact.</p> <p><i>It is recommended that extensive vegetative planting is required along the site boundaries, with ongoing monitoring and management of vegetation required should the development proceed.</i></p>	<p>It is noted that the image on the cover of the visual impact assessment provides an indication of how the SIMTA proposal would appear from within the site. It does not present an indication of the appearance of the proposal as viewed from outside the site. Section 13.3 of the EA and the Visual Impact Assessment outlines the potential visual impacts of the SIMTA proposal and potential mitigation measures, which are summarised in Section 10.3.1 and Section 16 of the EA.</p> <p>The following statement of commitment is included in the EA:</p> <p><i>The Proponent commits to the preparation and submission of a Landscape Management Plan with the detailed applications for the three major stages of the development that address each of the objectives and design principles contained within the Urban Design and Landscape report and the following mitigation measures:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Inclusion of an 18 metre wide corridor of screening vegetation and a bio-retention swale along the Moorebank Avenue frontage, which will utilise a selection of native tree species with dense tree canopy and low screen planting.</i></li> <li>▪ <i>A 'boundary treatment' or 'buffer zone' along the other site boundaries, consisting of existing local species in the area and providing an essential scale of planting to complement the built form, including:</i></li> </ul>	<p>Sections 13.3, 16 and 18.</p> <p>Appendix U <i>Visual Impact Assessment – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<ul style="list-style-type: none"> <li>▪ <i>Southern boundary: combination of 10 metre and 20 metre wide landscape corridors and a bio-retention swale adjacent to the warehouse and distribution facilities and Intermodal Terminal.</i></li> <li>▪ <i>Eastern boundary: total buffer zone of 13.5 metres consisting of 2.5 metre landscape corridor, a 6 metre internal light vehicle access road and a five metre wide bio-retention swale.</i></li> </ul>	
Visual and Urban Design	<p>The height of proposed warehousing has not been identified. Warehousing massing diagrams illustrating heights should be provided, with the warehousing located to assist in the visual screening of stacked containers. Furthermore, container stacking heights should be limited to below that of the adjacent buildings, with a recommended stacking height of three containers, reduced to two containers in visually sensitive locations.</p> <p><i>It is recommended that the location and height of container stacking is provided, with containers located away from boundaries and potentially sensitive receivers, particularly in the north east corner of the site, and with a maximum stacking height of three containers.</i></p>	<p>Section 5 of the <i>Visual Impact Assessment</i> and Section 3 of the <i>Urban Design and Landscape Report</i> describe the proposed building dimensions, including heights, lengths, widths and areas of all facilities that will comprise the SIMTA site. A visual impact assessment has been undertaken based on the greatest likely building footprint. The Urban Design and Landscape Report displays modelled indicative building designs and layouts. Section 2.5.2 of the EA sets out the maximum heights of the proposed buildings and structures on the SIMTA site, noting that warehouse and distribution facilities zones shall have building heights that shall not exceed 21 m high.</p> <p>Section 03.1 of the <i>Urban Design and Landscape Report</i> stipulates that containers that are sorted and stored in the container hardstand area will be a maximum of 5 containers high or 12.5 m. The container hardstand will be located on the western part of the site, adjacent to Moorebank Avenue. A stacking height of 5 containers is therefore considered appropriate as it would be shielded from view by the warehousing on the eastern portion of the site.</p>	<p>Section 2.5.2</p> <p>Appendix U <i>Visual Impact Assessment – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p> <p>Appendix E <i>Urban Design and Landscape Report – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013a)</p>
Visual and Urban Design	<p>The Assessment has not identified clear envelopes for structures, height, massing and site layout to confirm if the modelling is based on valid assumptions. Additionally, the digital images generated by the Visual Assessment show different structures from those shown in the</p>	<p>As noted above, Section 5 of the <i>Visual Impact Assessment</i> and Section 3 of the <i>Urban Design and Landscape Report</i> describe the proposed building dimension, including heights, lengths, widths and areas of all facilities that will comprise the SIMTA site. A visual impact assessment has been undertaken based on the greatest</p>	<p>Section 2.5.2</p> <p>Appendix U <i>Visual Impact Assessment –</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>Urban Design and Landscape Report (Reid Campbell, 2013).</p> <p><i>It is recommended that images showing the massing, forms, scale, height and layout of all the structures on site are provided, along with a detailed description of all structures, their function and location.</i></p>	<p>likely building footprint. The <i>Urban Design and Landscape Report</i> displays modelled indicative building designs and layouts. Section 2.52 of the EA sets out the maximum heights of the proposed buildings and structures on the SIMTA site.</p> <p>The <i>Visual Impact Assessment</i> notes that ‘</p> <p><i>Although a detailed site layout plan is yet to be developed, the Visual Impact Assessment and Light Spill modelling are based on the SIMTA Site Precinct Plan...which describes the likely maximum development envelope of built-form typologies within each Land Use Zone on the site.</i></p> <p>Photo montages are included in the <i>Visual Impact Assessment</i> to provide an indicative worst-case visual impact on the surrounding area. However, it is likely that the development envelope will be more conservative than that assessed in <i>Visual Impact Assessment</i>. The envisaged design is captured in the <i>Urban Design and Landscape Report</i>.</p>	<p><i>Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p> <p>Appendix E <i>Urban Design and Landscape Report – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013a)</p>
Visual and Urban Design	<p>The Visual Assessment does not state whether provision would be made for double stacking of containers on the rail network, or if the network has the capability to accommodate double stacked containers from Port Botany. Clarification is required, should double stacking be proposed additional visual assessment is required along the rail corridor to identify areas of potential visual sensitivity and the associated potential visual impacts.</p>	<p>Double stacking of containers on the rail network has previously been reviewed and has been deemed not to be a viable option. Double stacking containers would require significant augmentation within the rail network between Port Botany and Moorebank. Double stacking has therefore not been considered as part of the proposal.</p>	N/A
Visual and Urban Design	<p>The original EA stated that the visual impacts of the proposal would be ‘low’ (Urbis, 2012), whereas the revised 2013 EA identifies “no or minimal direct visual impact due to the distance of the site from residential areas, existing visual barriers and undulating topography” (Urbis, [a], 2013). It is unclear whether a ‘low impact’ is less intrusive</p>	<p>Section 02 of the <i>Visual Impact Assessment</i> outlines the assessment methodology used to assess the visual impacts associated with the SIMTA proposal. Section 03 provides the visual impact assessment criteria.</p>	<p>Section 13.5</p> <p>Appendix U <i>Visual Impact Assessment –</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>than a 'minimal impact'. The Assessment does not provide justification for the revised level of visual impact. Therefore, it is difficult to establish whether the revised proposal creates an improved visual environment and suggests that the assessment is arbitrary, lacking a rigorous methodology.</p> <p><i>It is recommended that the level of visual impact 'low' or 'minimal' be clarified with justification provided as to why the level was revised given the limited additional assessment undertaken.</i></p>	<p>The <i>Visual Impact Assessment</i> was updated to provide additional visual material to demonstrate the 'low' or 'limited' visibility and additional photo montages have been included in the report. The EA has been updated to reflect these changes, however the Summary and Conclusions made in regards to Visual and Urban Design remained unchanged. Section 13.5 of both the original EA (Urbis, 2012) and the updated EA (Urbis, [a], 2013) states:</p> <p><i>The Visual Impact Assessment undertaken by Reid Campbell has determined that the visual impact of the SIMTA proposal is relatively low, taking into account the existing DNSDC industrial buildings and the mitigation measures proposed to screen the intermodal terminal facility.</i></p>	<p><i>Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p>
	<p>The cumulative assessment is very limited, with discussion comprising two paragraphs, stating that there is a potentially high visual cumulative impact on residential receivers. However, revised EA states that the MIT development would potentially screen the SIMTA site from residences. The closest residences to the SIMTA site are located to the north and east, whereas the MIT proposal is located to the west. Consequently, the MIT site would not provide a visual buffer. However, the SIMTA site may provide a visual buffer to the MIT proposal. It is acknowledged that available information pertaining to the MIT proposal is currently limited. However, the Visual Assessment should have considered the overall mass of the site given that MIT propose a similar development to SIMTA and used this mass to inform the visual assessment.</p> <p><i>It is recommended that the Visual Assessment should include a comprehensive cumulative assessment considering the overall mass of the MIT site and associated visual implications.</i></p>	<p>An assessment of potential visual cumulative impacts as a result of the 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 12.4 of the EA and Section 09 of the <i>Visual Impact Assessment</i>. The cumulative assessment provided in Section 09 of the <i>Visual Impact Assessment</i> analyses the overall mass of the site based on the limited publically available information.</p> <p>The Community Information Boards (MIC 2013) have been reviewed and the information available is consistent with the cumulative impact assessment presented in the EA.</p> <p>Figure 10 and 11 in the <i>Visual Impact Assessment</i> show the location of residencies that the MICL and DLTP sites would provide a visual buffer to the SIMTA site for. Viewpoints 20-28, to the south-east of the site will not receive a visual buffer from either the MICL or the DLTP sites. Section 07 of the report notes that there will be no</p>	<p>Section 12.4</p> <p>Appendix U <i>Visual Impact Assessment – Transitional Part 3A Concept Application</i> (Reid Campbell, June 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>change to the visual amenity at any of these viewpoints, therefore resulting in no visual impact. The following statement of commitment is made regarding the treatment of the southern boundary of the site to minimise visual impact:</p> <ul style="list-style-type: none"> <li>▪ A 'boundary treatment' or 'buffer zone' along the other site boundaries, consisting of existing local species in the area and providing an essential scale of planting to complement the built form, including:</li> <li>▪ Southern boundary: combination of 10 metre and 20 metre wide landscape corridors and a bio-retention swale adjacent to the warehouse and distribution facilities and Intermodal Terminal.</li> </ul>	
Utilities	<p>There is no mention of the specific service requirements needed for the proposed use on-site. In addition to this, the specific infrastructure requirements associated with the additional section of the rail network comprising the rail link including signalling has not been described or discussed. The alignment of this utility service in relation to the proposal and surrounding environmental values needs to be considered in order understand the extent of impact associated and the required mitigation measures.</p> <p><i>It is recommended that the construction of additional utilities infrastructure should be considered, as works are likely to conflict with areas of environmental significance, such as signalling requirements associated with the rail corridor.</i></p> <p><i>It is recommended that the EA should be updated to included specific information as to the utility infrastructure requirements for the proposed facility. Details should include estimated utilities demand based on identified calculations, as well as the additional infrastructure requirements necessary to meet this demand.</i></p>	<p>Section 14.3.1 of the EA assesses the service demands of the SIMTA proposal and identifies the service provides for each utility. The current servicing capacity and locations are outlined in Section 14.3.2. Figure 29 shows the current utility service capacity and locations on the SIMTA site, including within the rail link. It is concluded that all standard utility services are available to service the SIMTA site.</p> <p>The <i>Utilities Strategy Report</i> provides an investigation of the utilities within the vicinity of the SIMTA site. It is noted that the extent or scale of impacts of the rail link within the rail corridor have been estimated due to limited available design information but that potential impacts may be reviewed when design and siting studies are completed for the subsequent stages of planning approval.</p> <p>The <i>Utilities Strategy Report</i> concludes that some lead in work and possible some network upgrades will be required, stating that:</p> <p><i>The extent of the upgrades of existing utility provider assets and the connection are subject to detailed negotiations with utility provides</i></p>	<p>Sections 14.3 and 18</p> <p>Appendix V <i>Utilities Strategy Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013c)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>at final design stage.</i></p> <p>The following statement of commitment is included in the EA:</p> <p><i>The Proponent will undertake further investigations, as required, and provide details that adequate services are available to the site and/or provide details regarding the proposed servicing upgrades. Details are to be provided with the applications for each of the future stages of the development.</i></p>	
Utilities	<p>The revised EA mentions that the installation of a water main to the site will be managed, with works undertaken in a manner to minimise disruptions however there is no detail as to how the management measures would be employed to ensure that minimal disruption is achieved.</p>	<p>Section 14.3.4 of the EA notes that:</p> <p><i>Any tie-in works would be coordinated with Sydney Water to minimise inconvenience to surrounding residences. Trenching works within the road reserves would also be timed and managed to minimise disruptions to traffic.</i></p> <p>Works will be undertaken in accordance with Sydney Water requirements as necessary to obtain a Section 73 Certificate under the <i>Sydney Water Act 1994</i>.</p>	<p>Section 14.3.4</p> <p>Appendix V <i>Utilities Strategy Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013c)</p>
Utilities	<p><i>Indicative utilities corridors and works programs should be identified, with mitigation and management measures associated with construction stated within the Statement of Commitments (SoC).</i></p>	<p>Section 3 of the <i>Utilities Strategy Report</i> and Section 14.4 of the EA conclude that all required utility services can be connected to the site to a sufficient scope to support the proposed SIMTA Intermodal Terminal Facility. Where augmentation of existing and proposed utilities would be required lead in infrastructure works would predominantly occur within road reserves, including Greenhills Road, Anzac Road and Moorebank Avenue. Appendix A of the <i>Utilities Strategy Report</i> shows the proposed location of utilities corridors.</p> <p>The level of assessment within the EA and the <i>Utilities Strategy</i></p>	<p>Sections 14.4 and 18</p> <p>Appendix V <i>Utilities Strategy Report – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting,</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>Report</i> is considered appropriate for Concept Plan approval. Further details will be provided as per the following statement of commitments:</p> <p><i>The Proponent will undertake further investigations, as required, and provide details that adequate services are available to the site and/or provide details regarding the proposed servicing upgrades required. Details are to be provided with the applications for each of the future stages of the development.</i></p>	August 2013c)
Health	<p>The Screening Level Health Risk Assessment (SLHRA) undertaken to define the potential health impacts of the proposal has determined that the proposal is unlikely to result in acute or chronic direct health effects. It is of note that the SLHRA has been undertaken based on limited information and that a further detailed assessment should be undertaken once details of the proposed works are defined and can be modelled. The SLHRA was also noted to have been undertaken using “conservative” estimates of emissions and so conclusions drawn from this report are accordingly limited.</p> <p><i>It is recommended that a detailed Screening Level Health Risk Assessment should be undertaken using detailed modelled air quality data once the details of the construction works are defined and that these results be assessed prior to the approval of construction of this proposal at this location.</i></p>	<p>Health impacts of the SIMTA proposal, including those associated with emissions, have been assessed within a <i>Preliminary Screening Health Risk Assessment</i> (Appendix W) and are discussed in Section 15.2 of the EA. Measures to mitigate impacts on air quality that would be adopted for the SIMTA proposal are outlined in Section 11.3. Additional impact assessments will be undertaken for the subsequent stages of planning approval, as identified as necessary by assessment requirements.</p> <p>Section 1.5 of the <i>Preliminary Screening Health Risk Assessment and Literature Review</i> provides details of information included in the preliminary screening HRA. It states:</p> <p><i>The air quality impact assessment is based on concept phase information for the project. The final development layout for the site has not been determined, these are necessary to accurately predict emissions from the IMT. In the absence of these details conservative assumptions that are likely to overestimate emissions have been modelled.</i></p> <p>Despite potentially overestimated emissions the assessment undertaken for the EA, including air quality impact assessment, has indicated low health risk associated with the proposal.</p>	Appendix W <i>Preliminary Screening Health Risk Assessment and Literature Review</i> (Toxikos 2012)



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>The following statement of commitment is included in the EA:</p> <p><i>The Proponent will undertake further health impact assessments for lodgement with each of the detailed planning applications for the three major stages of the development.</i></p>	
Economic impacts	<p>It is noted that there are some inconsistencies between the figures used in the EA and the figures used in the Economic Assessment.</p> <p><i>It is recommended that the EA is reviewed so that the data presented in the EA is consistent with the specialist reports, particularly the Economic Assessment.</i></p>	<p>Acknowledged. A typographic mistake has been found in the EA (Section 15.3) in relation to the proportion of the Liverpool and South West Sub-region populations that falls within the key working age group of 20 to 59 years. All other data has been reviewed and is consistent with the Economic chapter outlined in Section 15.3 of the EA.</p>	<p>Section 15.3</p> <p>Appendix X SIMTA Moorebank Intermodal Terminal Economic Assessment (Urbis, June 2013a)</p>
Economic impacts	<p>The economic assessment does not consider the existing number of jobs created by the Defence use of the site. Defence employment has a strong economic multiplier effects on the area, with many employees being brought into the area by Defence to both live and work, thus contributing significantly to the economy.</p> <p><i>It is recommended that the economic assessment consider job creation in the context of jobs currently generated by the Defence use of the site to establish the employment balance pre and post SIMTA's proposed use.</i></p>	<p>The Defence Logistics Transformation Program (DLTP) includes the relocation of all Defence activities from the SIMTA site. The DNSDC activities that currently occupy the SIMTA site will be relocated to the immediate north of the SITMA site and economic impacts associated with the relocation of the DNSDC from the SIMTA site would not be attributable to the SIMTA proposal.</p>	
Climate Change	<p>The priority risks identified in this CRA appear to be limited with a number of crucial risks to the project missing from the list including:</p> <ul style="list-style-type: none"> <li>▪ Flooding of access to and from the site, limiting emergency</li> </ul>	<p>An assessment of historical climate for the SIMTA proposal identified intense peak rainfall events, flooding and bushfire as the major risks for the proposal. The Climate Risk Assessment (Appendix Y) identified adaptation measures for control and</p>	<p>Section 18</p> <p>Appendix Y <i>Climate Risk</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>access and evacuation from the site.</p> <ul style="list-style-type: none"> <li>▪ Increased heatwave frequency posing a threat to workplace health and safety.</li> <li>▪ Increased storm damage to rail infrastructure including lightning strikes critical rail infrastructure such as signalling and site power.</li> </ul> <p><i>It is recommended that The Climate Risk Assessment be amended to include risks associated with work place health and safety as well as impacts limiting emergency access to and from the site.</i></p>	<p>mitigation of priority risks identified. The design of the SIMTA proposal will reflect these adaptation measures to mitigate potential risks posed by climate change, and result in the nominated level of residual risk.</p> <p>The following measures were identified in the Climate Risk Assessment with regards to the specific concerns:</p> <ul style="list-style-type: none"> <li>▪ Design of rail line to withstand flooding posed by increased frequency of extreme rainfall events.</li> <li>▪ Design of stormwater detention on-site to accommodate increased rainfall.</li> <li>▪ Maintain tracks stability through regular maintenance, use concrete sleepers</li> </ul> <p>Risks associated with increase heatwave frequency posing a threat to workplace health and safety is considered an OHSC issue that would be prevented with operational health and safety procedures and that is not related with the Concept Plan and design of the SIMTA proposal. However, as stated in Section 18 of the EA, SIMTA has committed to undertake further health impact assessments as part of the subsequent stages of planning approval.</p>	<p>Assessment – <i>Transitional Part 3A</i> (Hyder, June 2013i)</p>
Climate Change	<p>The adaption measure for the risk of increased operating costs should be amended to incorporate energy reduction measures such as energy efficient light fixtures and the use of solar panels in additional utilising multiple sources of energy to reduce reliance on a single source.</p> <p><i>It is recommended that energy reduction measures such as light efficient fixtures and the installation of solar panels be incorporated in to the mitigation measures of the Climate Risk Assessment to ensure the proposal is energy sustainable and that this assessment is consistent with the Ecologically Sustainable Development Section of</i></p>	<p>The <i>Climate Risk Assessment</i> (Appendix Y) assessed the potential risk of increased operating costs associated with carbon price and outlined the convenience of further exploring commercial opportunities of reducing reliance on single energy source.</p> <p>This has been acknowledged in Section 15.5 of the EA which outlines ESD opportunities for energy demand reduction. As described, reducing gross energy demands for the site, or a portion of it, and reducing demands during peak times could be achieved through the utilisation of self-generated energy during peak times, through shift time adjustments and scheduling or through selection</p>	<p>Section 15.5 and 18</p> <p>Appendix Y Climate Risk Assessment – <i>Transitional Part 3A</i> (Hyder, June 2013i)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<i>the EA.</i>	<p>of energy efficient equipment being utilised preferentially during peak demand times.</p> <p>Other energy efficient methods for reducing energy demand would be identified in the Marginal Abatement Cost Curve Assessment which SIMTA will undertake for a detail planning application in accordance to DGRs.</p>	
Ecologically Sustainable Development	<p>The ESD section of the EA does not identify how the three broad ESD initiatives proposed to be implemented across the proposal will be undertaken, how they will be monitored and how it will be determined as to whether these measures are adequate or successful and if further measures are required. The section only provides general statements about ESD and does not identify any specific commitments by SIMTA. Specific commitments to ensuring ESD would add credibility to this proposal and its statements of commitment to ESD.</p> <p><i>Specific commitments to ensuring and maintaining Ecological Sustainable Development should be included in this EA.</i></p>	<p>Section 15.5 of the EA identifies opportunities that exist across the life of the SIMTA proposal for ESD through the design, construction, operation, maintenance and decommissioning phases. It is noted that at each stage the primary opportunities are in energy and water conservation and waste minimisation and resource recovery. The ESD opportunities are summarised in Table 10 of the EA. Though the DGRs do not specify the need to</p> <p>The following statements of commitment is included in the EA:</p> <p><i>Where applicable the Proponent will implement the Environmental Sustainable Development initiatives across the construction, operation and decommissioning stages of the SIMTA proposal including:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Site management policies and strategies.</i></li> <li>▪ <i>Materials selection and energy and water demand management.</i></li> <li>▪ <i>On-site renewable energy generation.</i></li> </ul> <p><i>The following principles will be achieved during the design development and construction phase of the proposal:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Precautionary principles.</i></li> <li>▪ <i>Inter-generational equality</i></li> <li>▪ <i>Conservation of biological and ecological integrity.</i></li> <li>▪ <i>Improved valuation, pricing and incentive mechanisms.</i></li> </ul>	Section 15.5  Section 18

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Waste	<p>A review of potential waste material sources has found that some potentially hazardous materials have not been listed or considered in the Waste Management Strategy. The Phase 1 Environmental Site Assessment (ESA) was reviewed to understand the historic context of the site and any supporting studies that have identified possible contamination sources and the potential for hazardous materials to exist on the site, including:</p> <ul style="list-style-type: none"> <li>▪ Asbestos containing material (ACM)</li> <li>▪ PCB containing materials and equipment</li> <li>▪ Unexploded ordnance</li> <li>▪ Other hazardous materials - a dangerous goods store is located on the DNSDC Site and there has been regular use of pesticides and herbicides.</li> </ul> <p><i>It is recommended that the Waste Strategy identify and consider the potential presence of hazardous materials on Site which may be encountered during construction works.</i></p>	<p>A summary of previous land contamination investigations for the SIMTA terminal site has been presented in Appendix M and identifies the potential for PCBs and UXO on site. The <i>Preliminary Environmental Assessment</i> report recommended a Phase 2 ESA to assess the risk to the detailed design and construction of the rail corridor including a program of soil and groundwater sampling to be completed in accordance with the guidelines made or approved by the EPA under s105 of the <i>Contaminated Land Management Act</i> 1997.</p> <p>A commitment is made for the preparation of contamination management plans prior to commencement of construction, which would identify the extent of contamination and hazardous materials on site and the appropriate method for remediation and /or disposal of the material in accordance with legislative requirements. The following is included in the Statement of Commitments:</p> <p><i>Developing and implementing a contamination management plan as part of the project construction environmental management plan for managing contaminated materials either expected or unexpectedly encountered during the construction of the rail corridor. The contamination management plan would include detailed procedures on:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;</i></li> <li>▪ <i>Assessment, classification and disposal of waste in accordance with relevant legislation; and</i></li> <li>▪ <i>A contingencies plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials that may be encountered during site works.</i></li> </ul>	<p>Section 8.4 and 18</p> <p>Appendix N <i>Phase 1 Environmental Site Assessment – Rail Corridor Land for SIMTA Moorebank Intermodal Terminal Facility – Part 3A Concept Plan Application</i> (Golder Associates, April 2013b)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Waste	<p>The Waste Management Strategy (Hyder 2012 and Hyder, [g], 2013) does not adequately introduce the potential for contaminated waste to exist on site or provide any guidance as to the development of an unexpected finds protocol to appropriately identify, manage, classify and dispose of any suspected materials encountered that may be hazardous to human health or the environment.</p>	<p>A preliminary environmental assessment (Appendix M) has been undertaken for the rail corridor lands including the indicative rail link. Further investigations will be completed as part of the future detailed application(s). A Contamination Management Plan is to be prepared as part of a Construction Environmental Management Plan (CEMP) to address any expected or unexpected contaminated materials during the construction process. The following is included within the Statement of Commitments:</p> <p><i>Developing a Contamination Management Plan with detailed procedures on:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;</i></li> <li>▪ <i>Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill;</i></li> <li>▪ <i>Assessment, classification and disposal of waste in accordance with relevant legislation; and</i></li> <li>▪ <i>A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works</i></li> </ul>	<p>Section 9 and 18</p> <p>Appendix M Preliminary Environmental Site Investigation (Golder Associates 2013b)</p>
Waste	<p>In reference to Section 4 - Waste management and minimization strategy of the Waste Management Strategy (Hyder 2012 and Hyder, [g], 2013), it is recommended that a waste tracking system be developed during demolition, construction and operational phases of the project to monitor the following in relation to any off-site waste disposal activities:</p> <ul style="list-style-type: none"> <li>▪ Waste material characterization</li> <li>▪ Waste volumes</li> <li>▪ Waste destination (identify an external licensed waste receiving</li> </ul>	<p>Numerous waste streams are expected to be generated from the SIMTA site during the construction and operational phases. A waste management strategy (Appendix Z) has been developed in accordance to the Liverpool Council's Development Control Plan, 2008 and the waste management and minimisation framework to manage potential waste materials from the demolition, construction and operational phases of the Proposal.</p> <p>As outlined in Section 18 of the EA, SIMTA has committed to undertake a Phase 2 intrusive environmental site assessment for the proposed rail corridor lands, which would identify and quantify</p>	<p>Submissions Report</p> <p>Appendix Z Waste Management Strategy (Hyder Consulting 2013)</p> <p>Appendix M Preliminary</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>facility); and</p> <ul style="list-style-type: none"> <li>▪ Records of waste received (from external licensed waste receiving facility).</li> </ul> <p><i>It is recommended that the Waste Disposal Strategy be included to provide guiding protocols for how hazardous materials will be identified, managed, classified and disposed of throughout all phases of the project.</i></p>	<p>potentially hazardous materials on the site. Remediation strategies for contamination on site would be developed as required and managed through a Contamination Management Plan during construction. The quantities and types of materials to be disposed of offsite as identified within the Phase 2 investigations would be included within the waste management strategies within the CEMP.</p> <p>The Statement of Commitments incorporates the protocols outlined in the Waste Management Strategy where the Proponent commits to undertaking waste management in the demolition, construction and operational phases of the development.</p>	<p><i>Environmental Site Investigation</i> (Golder Associates 2013b)</p>
Waste	<p><i>It is recommended that:</i></p> <ul style="list-style-type: none"> <li>▪ <i>The potential for contaminated waste (asbestos, chemical contamination) exists (especially within the existing rail corridor and bushland areas to the south of Site) and should therefore be identified within Table 2: Potential waste materials</i></li> <li>▪ <i>The potential for asbestos containing wastes exists on the site and should therefore be identified within Table 2: Potential waste materials</i></li> <li>▪ <i>The potential for asbestos containing material to exist within buildings (roofing, lining and electrical fixtures/ panels) on the site should be identified within Table 3: Typical components of construction and demolition materials.</i></li> </ul>	<p>Asbestos-containing materials, PCB containing materials, unexploded ordnance, radon and other hazardous materials were assessed in the <i>Phase 1 Environmental Site Assessment</i> (Appendix N) undertaken by Golder Associates.</p> <p>It is acknowledged that these materials are potentially on site and the Waste Management Plan developed for the construction phase of the proposal would identify these waste streams.</p>	<p>Appendix N <i>Phase 1 Environmental Site Assessment- Rail Corridor Land for SIMTA Moorebank Intermodal Terminal Facility – Part 3A Concept Plan Application</i> (Golder Associates, April 2013b)</p>
Environmental risk assessment	<p>Further justification is required as to why the risk of increased traffic impact on Transport and Access risk was not assessed as 'Very High' both before and after mitigation. Using the risk assessment likelihood criteria of 'A' (Almost Certain) and consequence criteria of '4' (Major) or '5' (Severe) would both result in a 'Very High' risk ranking, which still seems more appropriate considering the potential long term and</p>	<p>Acknowledged. Based on the risk analysis categories and criteria presented in Figure 31 of the EA the risk both before and after the application of mitigation measures associated with increased traffic impact on Transport and Access risk could be assessed as 'Very High'.</p>	<p>Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	increasing impact on the broader community as the terminal grows.	A <i>Transport and Accessibility Impact Assessment</i> has been produced by Hyder (August 2013a). A Traffic Management Plan will be prepared prior to operation of the SIMTA development. The report also includes additional mitigation measures to reduce the risks associated with of transport and access. Notably, the proposed infrastructure upgrades will “deliver adequate capacity to the road network”. In addition the mitigation measures proposed to promote public transport will help achieve an employee public transport mode share shift of approximately 30%. This will further mitigate the risks associated with traffic and access.	3A <i>Concept Plan Application</i> (Hyder Consulting, August 2013a)
Environmental risk assessment	The risk of increased traffic impact on local roads and rail is still described as ‘High’ even after mitigation measures are applied. The principal mitigation measures proposed all require additional studies to be undertaken. Also, some amended access plans for site access and M5 access points and some additional transport modelling has been undertaken, it is recommended that these studies need to provide more specific analysis on what impacts the development will have on future car and truck traffic on roads within the Liverpool LGA, as well as those outside of the core project area which may still be affected.	<p>Section 16 of the EA describes the risk ranking before control measures are applied associated with a decrease in quality of local road and rail infrastructure as ‘Medium’. After control measures are applied this risk is reduced to ‘Low’.</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>	Section 16  Appendix F <i>Transport and Accessibility Impact Assessment – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)
Environmental risk	More detail should be provided in relation to risk of damage to road pavements and the consequences, not only in the core project area	The <i>Transport and Accessibility Impacts Assessment</i> includes information on the likely impact on the local and regional road	Sections 5.3 and

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
assessment	<p>but also in the other areas which will experience increases in heavy vehicle traffic movements, which include</p> <ul style="list-style-type: none"> <li>- Reduction in level of service at road intersections outside of the core project area</li> <li>- Increased maintenance or upgrade costs for upkeep of connecting roadways</li> <li>- Information on who will be responsible for any additional maintenance and/or upgrade costs.</li> </ul> <p><b>Identified as a key issue</b></p>	<p>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>Potential road upgrades have been identified for intersections that are likely to be impacted as a result of the SIMTA proposal. Section 8 of the <i>Transport and Accessibility Assessment</i> report outlines the required infrastructure upgrades necessary to deliver adequate capacity for the road network until 2031 and includes details of the proposed upgrade works (including of the M5 westbound on-ramp). It is noted that:</p> <p><i>The timing of the individual road and intersection capacity improvements will depend on a number of factors, but the prime factor would be the rate of development within the SIMTA site. A staged approach [to the road network upgrades] would be required as development progresses across the site.</i></p> <p>These road network upgrades would be discussed and negotiated with RMS, and potentially impacted stakeholders. All road upgrades would be designed in accordance with RMS or Council standards to support heavy vehicle movements.</p> <p>Mitigation measures, including infrastructure upgrades are included in Section 5.3.4.2 of the EA, and summarised in Section 16. Funding</p>	<p>16</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
		arrangements will be determined during progression of detailed design for the subsequent development stages. SIMTA will remain in consultation with all key stakeholders.	
Environmental risk assessment	Broad trip generation assumptions used in traffic modelling will introduce errors that ultimately skew trip generation results used to assess traffic network performance. This also introduces a risk of error for other areas of impact assessment such as noise and air quality which has not been identified or discussed.	<p>The <i>Transport and Accessibility Impact Assessment</i> includes information on traffic modelling and trip generation data. Section 6.5 of the report outlines the validation of truck generation modelled. Section 6.6 of the report discusses Sensitivity Testing carried out around key assumptions and Section 8.2 outlines the sensitivity analysis provided based on Aurecon's Trip Generation. Further Sensitivity analysis to assess the impact of changing container size, vehicle utilisation and employee totals was also carried out.</p> <p>It is recommended in Section 8.2 of the TIA that an actual truck trip generation survey from SIMTA site is undertaken after 24 months of operation of the terminal.</p>	Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application</i> (Hyder Consulting, August 2013a)
Environmental risk assessment	We note that the title of Table 3 in the Environmental Risk Analysis (Hyder, [h], 2013) is still showing the incorrect heading and should refer to "Criteria for evaluating consequence" and not "Criteria for evaluating likelihood".	Acknowledged.	Section 16
Environmental risk assessment	Air quality risk is shown to be reduced from 'Very High' to 'Medium' by the application of an Air Quality Management Plan. Justification for this needs to be provided as it is unclear what practical measures are available to reduce the risk by this margin. The above point is also exacerbated if air quality impacts are under-estimated, if, as identified by the review of the traffic assessment (Section 4.1), the traffic movements associated with the facility have been under-estimated.	<p>The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each stage which would provide air quality and dust management/ mitigation procedures to be adopted during each of the construction phases of the development.</p> <p>In accordance with this commitment, the subsequent stages of planning approval for development of the intermodal terminal stages, and associated mitigation measures, would align to the recommendations of reasonable and feasible mitigation strategies</p>	Submissions Report Section 18 Appendix F <i>Transport and Accessibility Impact Assessment – Part 3A Concept</i>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>provided in the best practice review.</p> <p>There is a commitment within the Statement of Commitments as follows:</p> <p><i>The Proponent shall consider the need to develop a vehicle efficiency and emissions reduction program for the facility to encourage good maintenance and efficient vehicle selection, taking into account the results of the air quality monitoring programme.</i></p> <p>This would also be reviewed in accordance with the recommendations of the 'best practice' review.</p> <p>As noted above the <i>Transport and Accessibility Impact Assessment</i> includes information on traffic modelling and trip generation data. Section 6.5 of the report outlines the validation of truck generation modelled. Section 6.6 of the report discusses Sensitivity Testing carried out around key assumptions and Section 8.2 outlines the sensitivity analysis provided based on Aurecon's Trip Generation. Further Sensitivity analysis to assess the impact of changing container size, vehicle utilisation and employee totals was also carried out.</p> <p>The following statement has been included in the Statement of Commitments:</p> <p><i>The Proponent commits to undertaking a review of national and international 'best practice' for the design and operation of intermodal facilities to identify reasonable and feasible management strategies to reduce air quality and noise impacts associated with construction and operation of the intermodal terminal development stages of the proposal.</i></p>	<p><i>Plan Application</i> (Hyder Consulting, August 2013a)</p> <p>Submissions Report</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Environmental risk assessment	Disruption to the community during construction is shown to be reduced from 'Very High' to 'Medium' by the application of Community Consultation and Involvement Plan. Better justification needs to be provided as it is unclear what practical measures are available to reduce the risk by this margin.	<p>The Proponent commits to the preparation of a Construction Environmental Management Plan prior to the construction of each of the construction phases of the development. Mitigation measures (including to reduce the risks for noise and vibration, traffic, air quality, bushfire risk, stormwater and flooding and heritage impacts) associated with construction will be implemented as per the construction management plans. Section 18 of the EA sets out the Statement of Commitments to address the potential impacts associated with construction phases on the proposal.</p> <p>The implementation of mitigation and management measures outlined within Section 18 of the EA and within the CEMP(s) prepared prior to construction commencing is expected to reduce the disruption to the community. These mitigation measures would be communicated with the community through a Community Consultation and Involvement Plan. Through the implementation of the raft of measures identified the EA the impacts to the community are determined to be 'Medium'.</p>	Section 18
Environmental risk assessment	There is still no discussion or information on who has responsibility for implementing the identified control measures. This is of particular relevance where infrastructure upgrades are required (For example in rail, road or intersection upgrades). Each mitigation or control measure needs to have a responsibility assigned, with indicative costs identified to ensure that adequate funding is in place prior to approval. Responsibility should consider both responsibilities for implementation and for funding provision.	<p>Road network upgrades would be discussed and negotiated with RMS, and potentially impacted stakeholders. Mitigation measures, including infrastructure upgrades are included in Section 5.3.4.2 of the EA, and summarised in Section 16.</p> <p>As road infrastructure upgrades would occur progressively through the development stages of the SIMTA proposal it is premature to establish funding arrangements. Funding arrangements will be determined in the detailed design and subsequent stages of planning approval. SIMTA will remain in consultation with stakeholders and is committed to providing the necessary infrastructure upgrades based on delivery of the proposal.</p>	Sections 5.3, 16 and 18

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>The following statements of commitment are included in the EA:</p> <p><i>The Proponent commits to negotiating with the relevant agencies/authorities as required to facilitate the staged delivery of [...] road infrastructure upgrades in accordance with the Transport and Accessibility Impact Assessment</i></p> <p><i>The Proponent shall work with ARTC to identify the timing, scope and staging of any required capacity enhancement to the ARTC Network.</i></p>	
Environmental risk assessment	<p>The risk assessment has identified a range of threatened flora species in the study area and has identified that an offset strategy should be developed to offset these species. It appears that there have been no changes to the rail alignment design through this area as a means to minimize impacts on listed endangered species, which would be a preferred measure to reduce the risk of impacts on significant flora and fauna. As this impact avoidance measure does not seem to have been utilised in the concept development then the residual risk should remain higher than 'Low'.</p>	<p>The alignment of the rail spur on the land to the south of the SIMTA site is designed for 35 kph speed with a minimum horizontal curve radius of 200 metres. The alignment has been determined based on current design specifications and requirements prescribed by ARTC.</p> <p>Relocation of the rail link to the east of the SIMTA site would result in a lesser impact to individual flora species (<i>Persoonia nutans</i> and <i>Grevillea parviflora</i> subsp. <i>Parviflora</i>) within the rail corridor; however, it would result in rail, freight handling and truck movements occurring closer to the residences at Wattle Grove and Moorebank, with reduced opportunities for constructed warehouses to effectively attenuate noise and air emissions generated by the terminal operations, or provide visual screening of the operation. It would also pose a safety hazard to the site by reducing the separation between truck container transfer points and warehouse container storage areas.</p> <p>A <i>Preliminary Biodiversity Offset Strategy</i> has been developed which sets out measures and priorities for the identification of offsets. The progression of this strategy is included with the Statement of Commitments. SIMTA is currently progressing the identification of offsets in accordance with the strategy. The</p>	<p>Section 18</p> <p>Appendix J1 <i>Flora and Fauna Assessment - Impact Assessment Report</i> (Hyder Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>following statement is contained within the Statement of Commitments:</p> <p><u>Off-Set Impacts</u></p> <p><i>The Proponent will update the Preliminary Biodiversity Offset Strategy (Hyder Consulting 2013) and continue to consult with the Department of the Environment (DOTE) and the NSW Office of Environment and Heritage (OEH) through subsequent stages of planning approval.</i></p>	
Consultation	The issue/response matrix reads like a prepared frequent questions and answers (FAQs). As such it is unclear who was consulted and what their concerns were.	This was developed based upon consultation with the community and submissions made regarding the proposed development. The concerns are identified within the issues/response matrix as raised by the community during exhibition of the EA.	
Consultation	The Community Information Centre (CIC) was located 7kms from SIMTA site and situated off the main Liverpool centre with irregular opening times (two or three days a week). The location of the CIC is not easily accessible to the community and this does not encourage community participation.	<p>The CIC is located in the heart of the Liverpool CBD, next to the shopping centre and close to public transport and parking. Liverpool is the nearest major centre to the site, maximising the opportunity for local people to visit the CIC.</p> <p>The CIC has remained open for appointment since the previous exhibition period in 2012, which was advertised both at the CIC and on the SIMTA website.</p> <p>The CIC opening was advertised extensively via:</p> <ul style="list-style-type: none"> <li>▪ the SIMTA website</li> <li>▪ a community newsletter sent to 10,000 homes in the area</li> <li>▪ adverts in the Daily Telegraph, Australian, Liverpool Champion and Liverpool Leader previewing the CIC opening and directing people to the SIMTA website for detailed information</li> <li>▪ advertisements in the Liverpool Champion and Liverpool Leader</li> </ul>	

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>providing details of opening times.</p> <ul style="list-style-type: none"> <li>advertisements and the SIMTA website also indicated the CIC would continue to be available to open by appointment throughout the exhibition period.</li> </ul>	
Consultation	It is difficult to determine the overall level of community support for or against project. Negative media reports and complaints made to Council indicate a very high degree of concern of residents from this proposal.	The <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting 2013) describes the issues raised during community and stakeholder consultation and how SIMTA has responded to issues. The report also notes the community action and media coverage associated with the SIMTA proposal to the date of public exhibition of the Concept Plan EA.	Appendix BB, <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting 2013)
Consultation	The outcomes of the report do not indicate geographical areas of resident concerns and is difficult to ascertain the level and type of concern by location.	<p>The majority of comments have been provided by people living in suburbs neighbouring the site. Their questions have mainly related to perceived or potential impacts on the local area.</p> <p>A number of comments have also been made by people who have not provided address details (for example, some of those who attended the CIC) or confidential submissions received during exhibition of the EA.</p>	
Consultation	The report does not discuss the potential for cumulative impacts resulting from the Federal Intermodal proposal.	Cumulative impacts of the MICL proposal and SIMTA proposal are identified as an issue within the <i>Community and Stakeholder Consultation Outcomes Report</i> and a summary of the outcomes of cumulative assessments for the EA are also included.	Appendix BB, <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting 2013)
Consultation	Continued negative media coverage indicates that the community consultation process has not been successful in building long term relationships with community or the proponent's reputation in the	The <i>Community and Stakeholder Consultation Outcomes Report</i> identifies the 'Guiding Principles' that have been adopted for community consultation for the SIMTA proposal. It is noted that the	

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	community.	<p>purpose of the consultation process is the following:</p> <p><i>The purpose of the consultation process is to inform the community and stakeholders about SIMTA's proposal for an intermodal at Moorebank and to identify key issues of concern to the community. These issues have been addressed during the preparation of technical studies included within the Environmental Assessment.</i></p> <p>SIMTA does not accept this comment and notes that a consistent and thorough consultation process throughout the preparation and revision of the Concept Plan EA.</p>	
Consultation	The 2013 EA states that the CIC has not been visited by the community since the exhibition of the previous 2012 EA. As no additional visits to the CIC have occurred this indicates a lack of willingness to promote the project by SIMTA and reinforces comments relating to the inaccessibility of the CIC.	<p>The Community Information Centre (CIC) was established to engage with the community and provide a place where people could come and view information, ask questions and provide feedback on the proposal.</p> <p>Seventy (70) people attended the Community Information Centre from February 2011 to May 2011. The information centre has remained open, by appointment; however no appointments have been requested from May 2011 to June 2013.</p> <p>In addition to the CIC, SIMTA have engaged with stakeholders through one-on-one meetings and have provided feedback channels via an email address and an information line.</p> <p>A further 14 community members attended the CIC during four widely advertised 'drop-in' sessions in September 2013. Adverts and the SIMTA website also indicated the CIC would continue to be available to open by appointment throughout the exhibition period.</p> <p>The CIC is located in the heart of the Liverpool CBD, next to the shopping centre and close to public transport and parking. Liverpool is the nearest major centre to the site, maximising the opportunity</p>	Appendix BB <i>Community and Stakeholder consultation outcomes report</i> (Elton Consulting, 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>for local people to visit the CIC.</p> <p>The CIC opening was advertised extensively via:</p> <ul style="list-style-type: none"> <li>▪ the SIMTA website</li> <li>▪ a community newsletter sent to 10,000 homes in the area</li> <li>▪ advertisements in the Daily Telegraph, Australian, Liverpool Champion and Liverpool Leader previewing the CIC opening and directing people to the SIMTA website for detailed information</li> <li>▪ advertisements in the Liverpool Champion and Liverpool Leader providing details of opening times.</li> </ul>	
Consultation	No analysis of the hierarchy of issues/complaints is provided in the report which makes it difficult to assess the level of concern by issues. This hierarchy of issues may elucidate which issues are of most concern to residents.	The purpose of the <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting 2013) is to describe the community and stakeholder consultation activities undertaken to the date of submission of the Concept Plan EA for exhibition; report on issues raised during community and stakeholder consultation and how SIMTA has responded to these issues; and to provide relevant data, such as website visits and attendances at the Community Information Centre. The feedback contained in the report cannot be construed as being statistically representative of opinion within the local community.	Appendix BB <i>Community and Stakeholder consultation Outcomes Report</i> (Elton Consulting, 2013)
Consultation	No evidence that community ideas and input has been incorporated into submitted concept application and overall project design.	The Concept Plan EA and design elements of the proposal have been revised in response to agency and public consultation and submissions over three years following the submission of the Preliminary Environmental Assessment to DPI in October 2011, the public exhibition of the Concept Plan EA in March 2012 and on-going consultation with stakeholders.	Appendix BB <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting, 2013)



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Consultation	<p>Additional review of the 2013 EA has also identified that the area in which community consultation is undertaken is not adequate or representative of the community which will be impacted upon by the proposal. The community consultation area should be expanded to include:</p> <ul style="list-style-type: none"> <li>▪ The suburbs of Glenfield and Macquarie Fields, which are located along the route of Cambridge Avenue and connecting roads that will receive increased traffic as a result of the proposal</li> <li>▪ The surrounding suburbs of Prestons, Lurnea, Liverpool and Chipping Norton, which are likely to utilize areas which will be impacted by increased traffic flows as a result of the proposal.</li> </ul>	<p>SIMTA distributed three separate letters to 8,600 residents on 14 July 2010, October 2010 and 4 February 2011 advising on project updates and providing fact sheets and community engagement information. In addition, advertisements were placed in local newspapers in March 2011 advising of the opening of the CIC.</p> <p>In March 2012, a newsletter was delivered to approximately 10,000 homes in Casula, Wattle Grove and Holsworthy. This distribution area encompasses directly surrounding suburbs and key areas of community interest. Nevertheless, consultation is not limited to these suburbs and the majority of activities (described below) have been advertised to the wider regional and Sydney community.</p> <p>Advertisements were placed in local newspapers in March 2012 advising of the opening of the CIC.</p> <p>For the exhibition period in September 2013, a newsletter was again delivered to approximately 10,000 homes in Casula, Wattle Grove and Holsworthy. Advertisements were again placed in local newspapers advising of the opening of the CIC.</p> <p>SIMTA is committed to ongoing consultation with the community and other stakeholders.</p> <p>To date, SIMTA has:</p> <ul style="list-style-type: none"> <li>▪ Held one on one meetings with stakeholders to discuss their issues with the proposal</li> <li>▪ provided a dedicated telephone hotline and email address for enquiries</li> <li>▪ shared information through its dedicated project website</li> <li>▪ sent letters and newsletters about the project and advising about the community information centre to nearby residents</li> </ul>	<p>Appendix BB <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<ul style="list-style-type: none"> <li>▪ continued to respond directly to community members who make inquiries via the SIMTA website and telephone hotline.</li> </ul> <p>SIMTA has actively sought out opportunities for consultation with stakeholders and the community throughout the planning process. SIMTA has not waited until the formal, statutory public exhibition period to consult. This consultation is beyond compliance with and in addition to the statutory requirements under the NSW planning system.</p>	
Consultation	<p>Whilst the DGRs provide a list of relevant parties in which consultation should be undertaken, it is noted that the DGRs state that project consultation should be “not limited to” this list. Cardno note a number of other relevant parties which should be directly consulted with throughout the refinement of this EA which have not been mentioned in the consultation of this project. These include:</p> <ul style="list-style-type: none"> <li>▪ The NSW Office of Water (NOW)</li> <li>▪ The Georges River Combined Councils Committee (GRCCC)</li> <li>▪ Fairfield City Council (FCC)</li> <li>▪ Bankstown City Council (BCC)</li> <li>▪ Campbelltown City Council (CCC)</li> <li>▪ Hawkesbury Nepean Catchment Management Authority (HNCMA)</li> <li>▪ NSW Department of Primary Industries (DPI)</li> </ul>	<p>The NSW Office of Water (NOW), NSW Department of Primary Industries (DPI) and Bankstown City Council have provided submissions on the EA.</p> <p>Campbelltown City Council provided a submission in response to the Concept Plan EA display, which has been responded to in this Submissions Report.</p>	<p>Appendix BB <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting, 2013)</p> <p>Submissions Report</p>
Consultation	<p>It is recommended that further community consultation is undertaken prior to the determination of this project, including:</p> <ul style="list-style-type: none"> <li>▪ Demonstrated consultation with a culturally and linguistically diverse background</li> <li>▪ Relocation of the CIC to a more appropriate and more accessible</li> </ul>	<p>SIMTA has and will continue to undertake an extensive consultation program for the SIMTA proposal. The consultation program has exceeded requirements and adopted best practice community engagement timeframes by commencing consultation activities a year before the lodgement of a preliminary environmental assessment under the State assessment process and two years</p>	<p>Appendix BB <i>Community and Stakeholder Consultation Outcomes Report</i> (Elton Consulting,</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>location</p> <ul style="list-style-type: none"> <li>▪ An increase in the opening hours of the CIC to allow access by a greater range of residents</li> <li>▪ A residential survey to actively obtain the views of the surrounding residents</li> <li>▪ Delivery of the letter to residents to a greater area including the residents in suburbs such as Prestons, Lurnea, Liverpool and Chippy Norton[sic], who will also be impacts by the proposal.</li> <li>▪ Direct consultation with a greater list of agencies such as those described above.</li> </ul>	<p>prior to referral under the EPBC Act.</p> <p>Non-English speaking background visitors to the CIC from linguistically diverse backgrounds will be advised that interpreter services are available and arrangements can be made on request.</p> <p>The CIC is located in the heart of the Liverpool CBD, next to the shopping centre and close to public transport and parking. Alternative locations, such as within Westfield, were not viable.</p> <p>The CIC is currently open on a 'by appointment' basis for members of the public and interested parties. The CIC will be open during public display periods for subsequent planning assessment stages and 'by appointment' as necessary.</p> <p>Effective engagement utilises a range of techniques to keep the community and stakeholders informed and updated. There is no 'one size fits all' approach and different techniques are needed for different projects, geographical areas and communities. While a resident survey is not proposed for SIMTA, extensive community consultation has been and will continue to be conducted. The consultation program includes a variety of different consultation activities. These include:</p> <ul style="list-style-type: none"> <li>▪ The Community Information Centre in the heart of Liverpool</li> <li>▪ A project website to provide information and promote consultation channels</li> <li>▪ A dedicated email and free call information line</li> <li>▪ Meeting with Liverpool Council, local MPs, community members and community groups</li> <li>▪ Distributing newsletters / project updates to over 8,000 local residences.</li> </ul>	<p>2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
Statement of Commitments	<p>The DGRs states that:</p> <p><i>“5. A <b>draft statement of Commitments (SoC)</b>. The SoC must incorporate or otherwise capture measures to avoid, minimize, manage, mitigate, offset and/or monitor impacts identified in the impact assessment sections of the EA and ensure that the wording of the SoC clearly articulates the desired environmental outcome of the commitment. The SoC must be achievable, measurable (with respect to compliance) and time specific, where relevant.”</i></p> <p>The draft SoC provided in the 2013 EA has been found to be neither measurable nor time specific. These parameters need to be added to the SoC in order to ensure that monitoring and compliance in line with these commitments is possible.</p>	<p>SIMTA considers the Statement of Commitments (SoC) to be at the appropriate level of detail for a Concept Plan Approval. This assessment is preliminary by virtue of the planning stage at which it has been conducted. SIMTA has undertaken a rigorous and robust assessment of the potential environmental issues and provided measures to mitigate impacts of the proposal.</p> <p>Also, mitigation measures have been included in this Submissions Report and attached Statement of Commitments to address further address any potential environmental issues associated with the proposal.</p>	<p>Submissions Report Section 18</p>
Justification: demand	<p>SIMTA has failed to include the planned but not approved IMTs in the consideration of its demand analysis. These include the adjoining MIT proposal, which will have a capacity for 1.2 million TEUs per annum for local movements and 0.5 million TEUs per annum for interstate movements, as well as the Eastern Creek proposal, which will have a capacity of approximately 0.5 million TEUs per annum.</p> <p><i>It is recommended that further need assessment is undertaken on the demand for SIMTA’s proposal, taking into account the capacity proposed by the MIT and the Eastern Creek projects.</i></p>	<p>The <i>Freight Demand Modelling</i> report, included as Appendix G of the EA describes the predicted growth in TEU throughput at Port Botany and the intermodal terminals that would be required to achieve the rail mode share advocated by NSW State government and Federal government policy. The report notes that an IMT will be required to service western Sydney, and this is likely to be the proposed Eastern Creek IMT. The report states:</p> <ul style="list-style-type: none"> <li>▪ <i>IMTs included in the model were each current and approved IMT, plus SIMTA/Moorebank and a notional western suburbs terminal in the Eastern Creek area was introduced for the last year of the forecast (2025).</i></li> </ul> <p>The SIMTA proposal and the MICL proposal would service the same freight catchment. 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. As noted in Section 3.3.2 of the EA and</p>	<p>Section 3.3.2  Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>the Freight Demand Modelling report, the intrastate freight catchment would be shared between the SIMTA and the MICL proposals, should they both proceed. Section 3.3.2 of the EA states:</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>	
Justification: demand	<p>Whilst Port Botany accounts for almost the entire volume of containerized import/export trade throughput in NSW. Most intermodal terminals service both local and interstate trades due to the ability to cover both markets once the infrastructure is established as proposed by the MIT proposal. However, SIMTA's proposal has not mentioned of transfer to rail for inter-state or inter regional delivery, yet this option has not been ruled out.</p> <p><i>It is recommended that research is undertaken and raw data provided from the existing IMTs showing their capacities and the split between local and interstate freight.</i></p>	<p>The <i>Freight Demand Modelling</i> report presents the results of modelling undertaken to derive an estimate of the catchment that would be serviced by the SIMTA proposal and reviews the capacities of the existing and proposed IMTs within the Sydney Metropolitan Region. As the SIMTA proposal is intended to facilitate port shuttle services, assessment of interstate movements and demand is not applicable to the SIMTA proposal. The MICL proposal has assessed the viability of interstate freight and determined that it would not be viable until 2030 at the earliest, as follows:</p> <p>Development of an interstate terminal when justified by market conditions, but estimated for the purposes of this business case to commence operations in 2030 (MICL Business Case 2012).</p>	Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)
Justification: demand	SIMTA's demand analysis is based on unpublished data that is impossible to verify.	The <i>Freight Demand Modelling</i> report lodged as Appendix G to the EA, provides details of the data used in the assessment. All data used is publicly available or available at request from NSW Ports.	Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan</i>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
			<i>Application</i> (Hyder Consulting, 2013)
Justification: demand	<p>The findings of the revised freight catchment demand analysis undertaken by Hyder state that by 2025, at which point the SIMTA site is proposed to be capable of operating at full capacity, there would be a demand to service 1 million TEUs per annum. The combined SIMTA and MIT capacity is proposed to be 2.7 million TEUs per annum resulting in supply outstripping demand, based on the demand analysis undertaken in the revised EA. The excess supply is likely to lead to a high level of redundancy and an inefficient use of the site and associated resources, or more likely a lowering of fees to attract additional throughput. The additional throughput would create additional wide ranging environmental impacts that are not currently considered by the environmental assessments, which are based on a total TEU through put of 1 million per annum, which is potentially 37 percent less than the actual throughput.</p> <p><i>It is recommended that a business case justification is provided for the SIMTA site that in combination with the MIT site would have a capacity of 2.7 million TEUs per annum, while only servicing a demand for 1 million TEUs per annum. Should an appropriate business justification not be available provide a realistic operating capacity for the site once operating at capacity in 2025 and associated environmental assessment.</i></p> <p><b>Identified as a key issue</b></p>	<p>The needs assessment for the SIMTA proposal is presented in the <i>Freight Demand Modelling</i> report, which establishes that there is a 1 million TEU port shuttle freight catchment that would be serviced by the SIMTA site. 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. As noted in Section 3.3.2 of the EA and the Freight Demand Modelling report, the intrastate freight catchment would be shared between the SIMTA and the MICL proposals, should they both proceed. The impact assessment undertaken for the operation of the SIMTA proposal at a full 1 million TEU throughput therefore represents a 'worst case' scenario for environmental impacts associated with the proposal.</p> <p>It is SIMTA's 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 &amp; 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>As stated in Section 3.4 of the EA:</p> <p><i>... the SIMTA proposal has been designed to be independent from the MICL proposal and service the needs of port related freight. As the SIMTA site is privately owned, it would assist the Commonwealth's planning to have some certainty of future use over</i></p>	Section 3.4  Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p><i>the SIMTA site, as they can then plan more broadly with consideration to this land use. In terms of operational efficiencies, there are advantages to have the SIMTA proposal developed ahead of the Commonwealth proposal to assist with timing and operational efficiency. It would also be unreasonable to subject the community to a further extended period of uncertainty spanning several years when this important component of the Government's transport strategy can be achieved now.</i></p>	
Justification: demand	SIMTA's proposal has not been identified in the current planned IMT development program and there is not a rigorous demand justification for the project within the identified timeframe provided, which is a key requirement under the DGRs.	<p>This statement is incorrect as the SIMTA proposal has been identified in the NSW <i>State Infrastructure Strategy</i> (2012) (SIS). As stated in the EA:</p> <p><i>The SIS recognises that there are two separate schemes being proposed at Moorebank, including a private sector (SIMTA) proposal and a Commonwealth Government (MICL) proposal. The SIS includes broad support of the intermodal concept, however, it recommends that State public funding for additional intermodal terminal capacity is minimised until there is greater clarity on whether the short-haul rail market is viable. Despite this recommendation, the Strategy supports the completion of the Southern Sydney Freight Line in order to deliver a dedicated freight rail network between Port Botany and Macarthur (INSW, p124). It also recommends that action be taken in the short term to identify and preserve a rail corridor for the Western Sydney Freight Line and land for the terminal at Eastern Creek (INSW, p125).</i></p> <p>The EA is considered consistent with, and satisfies the DGRs for the proposal.</p>	Section 3.5.5
Justification: demand	<i>It is recommended that evidence is provided demonstrating a commitment from ARTC in relation to the expansionary infrastructure</i>	ARTC lodged a submission (dated 21 October 2013) in response to the public display of the EA, which supports the proposal and states:	Section 2.5.3

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p><i>to service the SIMTA site and the funding arrangement.</i></p> <p><i>It is recommended that the scope and concept design of the expansionary infrastructure and the environmental assessment for such works is provided.</i></p> <p><b>Identified as a key issue</b></p>	<p><i>I can confirm that the proponent has had an on-going dialogue with ARTC in relation to the definition for the rail connection. ARTC expects to continue to work with the proponent as the rail link proceeds to subsequent design stages.</i></p> <p><i>In addition, the requirements for any required capacity enhancements to the ARTC network will be addressed in accordance with the relevant provisions of the ARTC Interstate Access Undertaking.</i></p> <p>As noted in the EA (Section 2.5.3), construction of the rail link would occur as the first stage of development of the SIMTA proposal and will be subject to additional environmental assessment subsequent stages of planning approval.</p>	
Justification: staging	<p>The staging program proposed by the revised EA has been compressed, with Stage 1 construction taking six months, whereas the original EA proposed a three year timeframe for Stage 1. Justification for the substantially reduced timeframe is not provided. Based on the likely extent of civil and structural works proposed it is unlikely that the reduced program is feasible. Consequently, based on the MIT proposal construction timeframe with commencement in early 2015 there would be cumulative impacts associated.</p> <p><i>It is recommended that the extent of the Stage 1 construction works is clarified and that environmental assessment of construction impacts associated with the concurrent development of both the SIMTA and MIT sites is provided, with the assessment including noise, air quality, sediment control, traffic, safety and amenity of the site and surrounds.</i></p>	<p>The staging programme represents undertaking of construction of the rail link concurrently with the intermodal terminal. This approach results in a more feasible, timely and efficient construction timeframe and achieves delivery of the strategic state rail mode share objectives.</p> <p>Further description of the proposed staging of the SIMTA development is included in the Submissions Report.</p>	Submissions Report
Justification: staging	The staging program within the original EA included construction of the initial 650m of rail siding within Stage 1, which is removed from Stage 1 in the revised EA. The construction of the rail sidings is not	Construction of the rail link and rail sidings would be undertaken during Stage 1 of the proposal. Construction of the rail link and	Section 2.5.3



Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>identified in the revised EA. It is unclear whether this is a deliberate omission, in which case the actual stage of construction for the rail sidings should be identified along with justification, or an error.</p> <p><i>It is recommended that the timeframe for construction of the rail sidings is clarified.</i></p>	<p>intermodal terminal would commence at this time.</p>	
<p>Justification: location of SIMTA and other IMTs</p>	<p>There is no information on the source of the base year container distribution data, other than quoting a survey undertaken in March 2000. There is no source of the survey and no indication of the detail, assumptions or methodology of such survey. This information should be provided and the raw data from the survey submitted.</p>	<p>The numbers were taken from the Sydney Ports Corporation <i>Metropolitan Sydney International Container Origin/Destination Analysis</i>, August 2000. This data is available from NSW Ports.</p> <p>The base year distribution data that was used for the <i>Freight Demand Modelling</i> report is presented within the report (Appendix G).</p>	<p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)</p>
<p>Justification: location of SIMTA and other IMTs</p>	<p>Using employment data and employment projection to determine container distribution is not considered appropriate without understanding the assumptions behind the original employment projection. It is more appropriate to use the current and future industrial land use data (i.e. current and future zoning) to determine container distribution. Additional analysis of zoning should be undertaken to further derive a pattern of container distribution for the base year and future years.</p>	<p>It is noted in the <i>Freight Demand Modelling</i> report (Appendix G) that:</p> <p><i>The precise future distribution of import and export containers within the metropolitan area will be determined by a complex series of factors, including the market's response to transport policy and the provision of port supply chain infrastructure.</i></p> <p>Section 3.3 of the <i>Freight Demand Modelling</i> report sets out the considerations used to estimate the future year container distribution, which included:</p> <ul style="list-style-type: none"> <li>▪ The 2006/7 data from Sydney Ports Corporation, which was allocated to ANZSIC categories of receiving industries to determine the proportion of containers destined for the three major employment categories.</li> <li>▪ Derivation of regional distribution factors according to the</li> </ul>	<p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>numbers of predicted jobs in each major employment category.</p> <ul style="list-style-type: none"> <li>▪ Weighting of the outcomes of this analysis in accordance with the <i>Metropolitan Sydney International Container Origin/Destination Analysis</i>.</li> </ul> <p>The methodology adopted to assess container distribution is considered appropriate. To state that the analysis was limited to employment projections is considered simplistic based on the information provided. Further, basing the distribution assumptions on land use zonings is not considered appropriate as land use zonings do not solely drive freight distribution and demand.</p>	
Justification: location of SIMTA and other IMTs	No consideration of the MIT proposal and its impact on SIMTA's catchment is provided. The report notes that the Commonwealth proposal is not as advanced as the SIMTA proposal. However, the Eastern Creek IMT, which has not even progressed to a development application stage, is included, illustrating the inconsistency in the assumptions used by SIMTA. A new catchment analysis should be submitted taking into account all planned proposals, including SIMTA, MIT and Eastern Creek.	<p>The <i>Freight Demand Modelling</i> report (Appendix G) 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>	Section 3.3.2  Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)
Justification: location of SIMTA and other IMTs	The catchment plans and distribution forecast do not include any indications of the truck route assumptions used in the model. It is noted that the model uses the 'most cost effective supply chain' to determine the catchment area of the individual industrial activity. The modelling results and truck routes need to be presented in the	The supply chain analysis is based on a review of the transport options between the port and the importer and the return of the empty containers (i.e. the mode of transport). The review did not analyse road traffic performance, which is presented in the <i>Transport and Accessibility Impact Assessment</i> . As noted in Section	Appendix F Transport and Accessibility Impact Assessment –

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>additional information submitted by SIMTA, as well as the data behind the model.</p>	<p>4.1 of the <i>Freight Demand Modelling</i> report, the following assumptions were adopted:</p> <ul style="list-style-type: none"> <li>▪ <i>In the long term, it is assumed that the choice of supply chain will be based purely on lowest cost</i></li> <li>▪ <i>Direct road haulage to/from the port will only occur within the catchment for which it is the most cost competitive compared to rail</i></li> <li>▪ <i>Intermodal terminals are each assumed to serve a discrete catchment, whereas in reality there would be a degree of overlap between the catchments of each terminal driven by commercial arrangements</i></li> <li>▪ <i>All intermodal terminals would, in the long-term, operate on a similar, efficient rail and road cost basis.</i></li> </ul> <p>These assumptions are considered suitable for the assessment of the proposal.</p>	<p>Transitional part 3A Concept plan Application (Hyder Consulting, August 2013a)</p> <p>Appendix G <i>Freight Demand Modelling – Transitional Part 3A Concept Plan Application</i> (Hyder Consulting, 2013)</p>
<p>Justification: location of SIMTA and other IMTs</p>	<p>A government led master planning process should be undertaken addressing development across both the SIMTA and MIT sites, with both Local and State Government, as well as the proponents involved.</p> <p><b>Identified as a key issue</b></p>	<p>The Concept Plan EA provides a suitable assessment of the environmental impacts of the SIMTA proposal and cumulative impacts of the neighbouring MICL proposal. This EA meets the DGRs, has considered all relevant available information. The EA concludes that the proposal is consistent with strategic desired future of the area and therefore adequate for approval.</p> <p>Liverpool City Council's comment is noted; however SIMTA has no control over this process or recommendation.</p>	<p>N/A</p>
<p>Justification: location of SIMTA and other IMTs</p>	<p>Based on the revised catchment demand analysis, justification is required for the reasons for co-locating two IMTs at the same location with a total capacity of 2.7 million TEUs per annum. If the demand within the identified catchment does not justify such capacity, the proposal needs to be revised to consider the following alternatives:</p>	<p>As 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</i></p>	<p>Section 3.3.2</p> <p>Appendix G <i>Freight Demand Modelling – Transitional Part</i></p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
	<p>- Reduce the capacity of this development to meet the required demand within the appropriate timeframe.</p> <p>- Consider the opportunities to upgrade or expand the existing IMTs, based on the catchment demand, current and future warehouse distribution and truck movements and undertake appropriate environmental assessment to consider cumulative impacts at this higher level of throughput.</p> <p><b>Identified as a key issue</b></p>	<p><i>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>The design development and planning approval process for the MICL proposal is not under the control of SIMTA. SIMTA has undertaken significant effort to ensure that the environmental assessment has considered the cumulative impacts associated with sharing of the total catchment demand between the two facilities. The assessment provided satisfies the DGRs and is consistent with the requirements for Concept Plan approval. The following assessments were undertaken to determine potential cumulative impacts associated with the two proposals:</p> <ul style="list-style-type: none"> <li>▪ The noise impact assessment assumed a 'worst case' operating scenario and shared these impacts equally between the two sites. The assessment confirmed that with appropriate mitigation measures applied the noise criteria prescribed by the EPA would not be exceeded.</li> <li>▪ The air quality impact assessment adopted a worst case operating scenario for the SIMTA site and shared the impacts between the two sites; demonstrating that the combined activities could occur without exceedences to air quality guidelines.</li> <li>▪ Traffic modelling and freight demand modelling undertaken for the proposal has demonstrated that the total port shuttle freight demand within the catchment that would be serviced by the two proposals is 1 million TEU. Traffic modelling has demonstrated that, with the mitigation outlined in the EIS applied operation of the two proposals, with a shared freight catchment could occur</li> </ul>	<p>3A Concept Plan Application (Hyder Consulting, 2013)</p>

Aspect	Issue	Clarification / Response	EA Section/ Specialist Study reference
		<p>while maintaining the existing level of service at the intersections impacted.</p> <p>Further, the <i>Freight Demand Modelling</i> report considers the existing IMTs within the Sydney Metropolitan Region and concludes that they do not have sufficient capacity to service the freight catchment that the SIMTA proposal would target.</p>	