Respondent: Campbelltown City Council

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
Key Issue - Rail Access	Rail Access from the Southern Sydney Freight Line needs to be constructed prior to any commencement of terminal operations. Importantly, arrangements for rail access to the site from the Southern Sydney Freight Line must be secured prior to the submission of any Project Approval applications. **Recommendation One:** Concept Approval not be granted unless and until delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line is secured. Alternatively, in the event that Concept Approval is granted, that approval become inoperative if the link is not secured within an appropriate timeframe or the lodgement of individual Project Applications be prevented unless and until delivery of the rail link is secured.	The *Rail Access Report* provides information on the proposed rail access to and from the SIMTA site and interaction and integration with existing and planned rail infrastructure and services including the Southern Sydney Freight Line (SSFL) and includes a discussion of future expansionary infrastructure requirements on the SSFL. Section 2.2 of the *Rail Access Report* 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 not only the SIMTA site, but also a future whole of precinct access arrangement, with the MICL site able to access through the same connection point to the SSFL. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. Further, the following Statement of Commitment is included in the EA (refer to Section 18): *The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed planning application for the first stage of works. …* Rail access would be secured by SIMTA through a Connection Agreement and Interstate Access Agreement with ARTC, prior to operation of the rail link and intermodal terminal. As noted in ARTC's submission (21 October 2013), SIMTA is working with ARTC to progress the rail link connection to the SSFL through an Interstate Access Undertaking, which has been accepted by the Australian Competition and Consumer Commission (ACCC). Agreements with ARTC will be secured through the Interstate Access Undertaking, which is not linked to the submission of Project Approval applications.	Section 18 Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
Key Issue - Traffic	Road traffic implications of the proposal need to be re-examined in close consultation with Council, and in light of admissions by the Government's own Transport and Infrastructure agencies that the off-site road impacts remain to be defined. In this regard, it is noted that the proposal relies on an implicit assumption that road traffic to and from the terminal will use Moorebank Avenue to the exclusion of any other means of access, such as Cambridge Avenue. Council does not agree with this view, as emphasised in its previous submissions. The upgrade of Cambridge Avenue as previously identified by Council and the construction of a connecting road between Glenfield and the M5 need to be required as part of any approval, in order to assist in the management of likely traffic impacts in the local Campbelltown community. **Recommendation Two** Council be consulted directly by RMS with a view to satisfactorily determining the potential traffic implications for roads other than Moorebank Avenue, such as Cambridge Ave, from terminal operations on the SIMTA site, together with synergistic effects from the operation of SIMTA and other major transport related operations in the vicinity, prior to any approval being granted to the SIMTA proposal.	The *Transport and Accessibility Impact Assessment* includes information on the likely impact on the local and regional road networks with and without the SIMTA proposal. Additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as the M5 Motorway, Hume Highway and M7 Motorway. The likely traffic increase from SIMTA towards the south (via Cambridge Avenue) is considered to be low, with only 5% of employee vehicles (180 vehicle movements per day, distributed throughout the day) and 5% of rigid trucks (52 movements per day) using the route, with no B-doubles /container trucks using it. The *Transport and Accessibility Impact Assessment* has not identified the need for a new link between the Hume Highway and Moorebank Avenue (via Cambridge Avenue). It is also noted that Cambridge Avenue is currently subject to restrictions under the Roads Transport (Mass Loading and Access) Regulation 2005 and the Road Transport (Vehicle Registration) Regulation 2007, which prevents restricted access vehicles (RAVs) 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. As only sections of Cambridge Avenue currently allow for 'Restricted Access Vehicles' and timing restrictions are applicable for its use, its feasibility and practicality as an access route, even for rigid trucks is limited. Further, TfNSW has provided a submission (November 2013, Ref: CD13_17339) during the most recent exhibition period for the EA, which identifies the possibility of a road closure of Cambridge Avenue. If this were to occur traffic would be unable to access the SIMTA site from the south (i.e. via Cambridge Avenue).	Section 5.3 Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a)
	The responsibility for identifying the nature and extent of, and construction, essential off-site infrastructure has not been clearly	The indicative staging program and TEU thresholds are presented in the	Sections 5.3

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	established, based on published comments of the Government's own Transport and Infrastructure agencies. Without timely commitments to putting this infrastructure in place, approval of the terminal would not be appropriate.	*Transport and Accessibility Impact Assessmen*t report. The Statement of Commitments has been updated to reflect the timing of proposed road infrastructure upgrades identified in the *Transport and Accessibility Impact Assessment* report. This includes the widening of Moorebank Avenue between the M5 Motorway/Moorebank Avenue grade separated interchange and the southern SIMTA site access as well as the indicative annual TEU throughput at the SIMTA site that would trigger delivery of the infrastructure upgrades. It is noted in Section 5.3 of the EA, that these road network upgrades would be discussed and negotiated with RMS and potentially impacted stakeholders. Funding arrangements will be determined in the subsequent stages of planning approval. SIMTA will remain in consultation with all key stakeholders. Detailed design of the upgrade works would be undertaken in accordance with all applicable design guidelines and standards. A Statement of Commitment has been updated as follows: *The Proponent commits to negotiating with the relevant agencies/authorities as required to facilitate the staged delivery of the following road infrastructure upgrades in accordance with the Transport Accessibility Impact Assessment:* ▪ *Provide a new traffic signal at SIMTA's southern access with Moorebank Avenue.* ▪ *Provide a new traffic signal approximately 750 metres south of SIMTA Central access.* ▪ *Widen Moorebank Avenue to four lanes between the M5 Motorway/Moorebank Avenue grade separated interchange and the southern SIMTA site access. Some localised improvements will be required around central access and southern access points.* ▪ *Concurrent with four lane widening on Moorebank Avenue, the Moorebank Avenue/Anzac Road signal will required some form of*	and 18 Submissions Report Appendix F *Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		widening at the approach roads. ▪ *Potential upgrading works at the M5 Motorway/Moorebank Avenue grade separated interchange to cater for both background and additional SIMTA traffic growth as outlined in Table 9-1 of the Transport Accessibility Impact Assessment (and Table 6 of the Environmental Assessment report).*	
Key Issue	The broader implications of introducing a major new development such as SIMTA Terminal into the existing urban fabric, must be examined. Council seeks a commitment from the State Government to assess these implications so as to maximise the benefit of the terminal to the local area.	The potential construction and operation impacts of the SIMTA proposal have been assessed through specialist studies to inform the EA. These assessments consider the direct and indirect potential impacts on each environmental aspect for the construction and operational phases of the SIMTA proposal. Further, the potential cumulative impacts of the SIMTA proposal are outlined in Section 3.3.3 of the EA and addressed under each environmental impact assessment chapter. In addition, the EA has given detailed consideration to the adjoining development; the MICL proposal for the development of the SME site in Section 3.4 of the EA. Section 3 of the EA outlines the Strategic and Project Justification of the SIMTA proposal. It is noted in Section 3.5 that: *There has been strong and consistent policy support at State and Commonwealth level for the expansion of the freight rail network across NSW and the development of an intermodal Terminal Facility at Moorebank since 2004. … [T]he proposed SIMTA Intermodal Terminal Facility responds to the aims and objectives of each of the existing and draft State and Commonwealth policies and plans, including the objective to double the tail modal share of freight movement to 28%.* The importance of delivering an Intermodal Freight Terminal within Moorebank is outlined in the *South West Subregion Draft Subregional Strategy,* which states: *The State Government regards the proposal for a transport terminal at Moorebank as a key component in meeting Sydney's intermodal capacity*	Sections 3, 3.4, 3.5 and 3.6 Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		needs. [p.30] SIMTA are committed to working closely with the NSW Government and to continue to consult with relevant government authorities and bodies, to deliver the overarching strategic objectives for NSW. Appendix B to the *Rail Access Report*, included as Appendix H to the EA, demonstrates how the proposed SIMTA rail link can be accommodated within the East Hills Passenger Line corridor, alongside the quadruplication of the passenger line, as identified in the NSW Government's Long Term Transport Master Plan. The SIMTA Intermodal Terminal facility will provide the timely delivery of an intermodal terminal in a planned location to deliver economic and efficiency benefits in the movement of freight. Furthermore, SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	
Key Issue - Traffic	In the event of any approval being issued, appropriate conditions must be imposed to control noise and dangerous goods transport. While the Impact Assessment carried out for the proponents suggests off-site noise and dangerous goods transport impacts will not adversely affect the City of Campbelltown, this assessment has been carried out in the context of terminal generated road traffic using Moorebank Avenue. As noted above Council contends that this is not a valid assumption. Accordingly, noise assessments and controls over dangerous goods transport need to be re-visited in the context of	The *Transport and Accessibility Impact Assessment* identified only 5% of rigid truck movements and 5% of employee trip movements to travel south from the SIMTA proposal, using Cambridge Avenue, with no container/ B-doubles using this route. The distribution of container and rigid truck movements from the SIMTA site was based on the freight catchment assessment presented in Appendix G, *Freight Demand Modelling Report.* 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	Appendix F *Transport and Accessibility Impact Assessment – Part 3A Concept Plan Application* (Hyder Consulting,

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	a re-assessment of road network usage.	and the origin and destination of freight received at the terminal. The strategic traffic model that has been used to assess the SIMTA proposal includes the entire Sydney Metropolitan Region. Heavy vehicle movements from the SIMTA site would be primarily redistributed to the west of the M5 Motorway/Moorebank Ave interchange in Liverpool, partly to the South West (from the M5 Motorway via Hume Highway and M7 Motorway) and to the industrial areas in Western Sydney. The distribution of vehicles adopted for the *Transport and Accessibility Impact Assessment* is based on Journey to Work (JTW) and House Travel Survey (HTS) data for the Moorebank catchment sourced from Bureau of Transport Statistics (BTS) and the *Freight Demand Modelling Report*, included as Appendix G of the EA. It is noted that the submission received from TfNSW (November 2013) states that TfNSW is satisfied that the future trends in container origin/destination in Sydney and the identification of the SIMTA proposal's freight catchment area and freight split has been adequately addressed at the Concept Plan level. Section 6.3 of the *Noise Impact Assessment* assesses the potential noise impacts associated with traffic accessing the site via road. The report found that predicted road traffic noise levels along the M5 Motorway and Moorebank Avenue, where the majority of traffic is expected to be distributed, would be well below a 2 dBA increase, based upon criterion prescribed by the Road Noise Policy for residential receivers. As only 5% of employee trips and 5% of rigid truck movements would travel south from the SIMTA proposal, entering the Campbelltown City Council Local Government Area (LGA), noise impacts within the LGA are predicted to be well below the 2 dBA criterion at all residential receivers. The transport of hazardous materials is regulated in NSW and is the subject of legislation that is administered by the Office of Environment and Heritage (OEH). The legislative system for managing the transport of dangerous goods by road and rail are: ▪ Dangerous Goods (Road and Rail Transport) Act 2008.	August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a) Appendix I *Noise Impact Assessment* (Wilkinson Murray, August 2013) Appendix L, *Hazards and Risk Assessment* (Hyder Consulting, August 2013)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		▪ Dangerous Goods (Road and Rail Transport) Regulation 2009. ▪ Australian Dangerous Goods Code. As discussed in the *Hazards and Risk Assessment* the types of goods received at the site would be constrained by a number of factors, including the types of goods that are permitted to be transported on the SSFL and those goods which are containerised. This means that items such as explosives and flammable gases would not be transported to the SIMTA proposal, regardless of the transport routes adopted. A preliminary hazard assessment (PHA) will be undertaken, as required by the State approval process and *State Environmental Planning Policy No 33- Hazardous and Offensive Development*. Once the level of risk has been identified, the aim will be to reduce the risk to as low as possible through the application of specific management procedures that will form part of the framework for managing risks. SIMTA will require tenants proposing to store or handle dangerous goods to demonstrate measures to reduce the risk to an acceptable level prior to the acceptance of tenancy. Tenants would also be required to develop procedures to minimise the risk and management of spills, should they occur.	
Key Issue - Noise	Council notes that, in the event of approval, the proponent has committed to carrying out noise monitoring once the terminal is operational. There is, however, no consequent commitment to carrying out amelioration works if that operational monitoring shows that to be necessary. This must be addressed in the event of any approval. **Recommendation Eight:** Council request the State Government impose all noise controls related conditions proposed at p76 of the IA Report and accepted by the proponent in its Draft Statement of Commitments (p174 of the IA Report) in the event the proposal is approved.	SIMTA is committed to carrying out detailed assessment, including monitoring of operational noise, to validate noise models and the ongoing compliance of the development. As noted within Council's submission, noise monitoring was undertaken within the suburb of Glenfield to establish background noise levels and the applicable criteria at this location for the SIMTA proposal. Operational noise monitoring, as presented within the Statement of Commitments, would be undertaken to validate the modelling presented in the Noise Impact Assessment. The following Statements of Commitment are included in the EA: *The Proponent will carry out detailed assessment when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate models used in*	Section 18 Appendix I, *Noise Impact Assessment* (Wilkinson Murray, 2013

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		these assessments. *The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum.* The Statement of Commitments has been updated to link the requirement for a noise barrier to the outcomes of the operational noise monitoring: *The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined in response to the operational noise monitoring.*	
Key Issue - Visual Impact	In the event of approval, appropriate conditions need to be imposed to control the visual impact of the proposal on the City of Campbelltown.	A *Visual Impact Assessment* has been prepared to assess the visual impacts of the SIMTA proposal. 40 key locations within the surrounding area were assessed for visual impact. Mitigation measures to reduce the visual impact are outlined in Section 13.3.1 of the EA. Section 13.3.1 of the EA states: *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.* It is noted that the prominent viewpoints identified within the *Visual Impact Assessment* are not within the Campbelltown LGA. Views 29, R02, R03, R04	Section 13.3.1 Appendix U *Visual Impact Assessment* (Reid Campbell, June 2013b)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		and R05 present viewpoints from within the Campbelltown LGA and demonstrate the minimal visual impact the SIMTA proposal will have on Campbelltown City Council area. The assessment concludes that: *The proposed landscape treatments would reduce the visibility of the development and improve the overall visual amenity of the site and locality.* Due to the distances from the proposed SIMTA site, it is not expected that the SIMTA proposal will have a visual impact on the City of Campbelltown.	
Traffic and Access	Documentation for the revised proposal suggests that traffic implications of the SIMTA development will have only localised impact within a "core area" around the site. It is not clear what modelling has been carried out to assess implications (e.g.) for Cambridge Avenue. It is imperative that this deficiency be addressed in direct discussion with Council. In this regard, it would appear that the consultants who prepared the "Transport and Accessibility Impact Assessment" (Hyder) did not consult with Council as part of their work.	As discussed above and presented in the *Transport and Accessibility Impact Assessment,* only 5% of employee generated trips and 5% of rigid trucks would use Cambridge Avenue to access the site. The distribution of container and rigid truck movements from the SIMTA site was based on the freight catchment assessment presented in Appendix G, Freight Demand Modelling Report, which has been accepted by TfNSW as representing the origin/destination of the intended freight catchment for the SIMTA proposal. Employee car movements to and from the site were distributed based on the Journey to Work (JTW) and House Travel Survey (HTS) data for the Moorebank catchment, sourced from Bureau of Transport Statistics (BTS). Heavy vehicle restrictions apply to Cambridge Avenue to the south which would inhibit use of this road by heavy trucks, including B-doubles /container trucks. As identified in the *Freight Demand Modelling* report, the freight catchment that is serviced by the SIMTA proposal is located largely to the north and west of the SIMTA site. The Macarthur Intermodal Shipping Terminal services the freight catchment that the Campbelltown LGA is located within. The strategic traffic model that has been used to assess the SIMTA proposal includes the entire Sydney Metropolitan Region. The SIMTA heavy vehicle movements would be primarily redistributed to the west of the M5 Motorway/Moorebank Ave interchange in Liverpool, partly to the South West (from the M5 Motorway via Hume Highway and M7 Motorway) and to the	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		industrial areas in Western Sydney. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as the M5 Motorway, Hume Highway and the M7 Motorway. It is noted that the submission received from TfNSW states that TfNSW is satisfied that the future trends in container origin/destination in Sydney and the identification of the SIMTA proposal's freight catchment area and freight split has been adequately addressed at the Concept Plan level. It is also noted that the trip to access the Hume Highway, heading north-west from the SIMTA site, via Cambridge Avenue and Glenfield Road is a distance of approximately 11 km, while the trip via the Hume Highway via Moorebank Avenue and the M5 Motorway is approximately 3 km. There would be no incentive for vehicles to take the longer route. The *Transport and Accessibility Impact Assessment* 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.	
Traffic and Access	The Director General's Requirements for the Impact Assessment include the following issue in relation to Transport and Access: *(d) cumulative impacts, particularly with regard to existing and proposed freight distribution facilities in the locality and potential cumulative mitigation measures.*	Appendix G of the EA, the *Freight Demand Modelling Report*, identifies the discrete freight catchments within the Sydney Metropolitan Region. As SIMTA and the MIST IMTs are located within different freight catchments there would be little interaction between the two facilities. Within the report it is noted that there may be some overlap between the freight catchment areas serviced by the intermodal terminals identified. However, this would be driven by commercial arrangements and it is not considered financially viable for goods	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting,

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	The Impacts Assessment Report purports to have examined this issue in Section 6.9 and 8 of Appendix F inspection of these sections however reveals that they only deal with regional traffic and network improvement and mitigation measures. There is no reference to synergistic effects with other freight facilities such as MIST or the Ingleburn rail siding, or indeed a potential second intermodal terminal adjacent to the SIMTA proposal, all of which could have a crucial impact on Council's road system if not adequately supported by appropriate off site infrastructure.	to be transported between IMTs as, for IMTs to be commercially viable, they '*must be able to offer a door to door delivery price, inclusive of bundled costs, that can compete with the cost of direct road delivery from the port'* (Moorebank Catchment Area Memo – TfNSW, included in Appendix G of EA). The *Freight Demand Modelling Report* acknowledges that multiple IMTs are required throughout Sydney to achieve the State Government's freight rail mode share target of 28% and the exiting IMTs, such as MIST, and proposed IMTs, such as Eastern Creek and the SIMTA proposal, will operate together to increase the rail mode share of freight movements. As noted in Council's submission, Section 6.9 of the *Transport and Accessibility Impact Assessment* discusses the implications of the cumulative impacts on traffic of the MICL proposal and the SIMTA proposal, and states*:* *The traffic impact from SIMTA proposal has been assessed based on the forecast demand of one million TEU. Any future proposal by the Moorebank intermodal Company Limited (MICL), formerly 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.* The *Freight Demand Modelling* report further clarifies SIMTA's position with regard to the total freight catchment demand that would be shared between the MICL and SIMTA proposals. 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 SIMTA proposal has been assessed having regard to a total throughput capacity of one million TEU per annum for port shuttle freight. Accordingly, the assessment has fully considered the cumulative impacts of the proposal in the event that it proceeded concurrently with the MICL proposal and notes	August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		it will result in substantially the same traffic impacts. It is our understanding that operation of the MICL site for the purpose of interstate freight movements would not commence until 2028 /2030 (MICL Information Boards, October 2013 & Detailed Business Case, (KPMG) February 2012) and would be subject to further assessment of market demand. The timeframe identified by MICL for development of interstate freight handling capacity is beyond the future case adopted for the SIMTA proposal.	
	The State Infrastructure Strategy (SIS) 2012 indicates that, without investment in facilities such as intermodal terminal, road freight will continue to out-compete rail for port traffic. INSW observe that: *Emphasis has been placed on getting more port containers to move by rail, taking advantage if available capacity on the rail network. This has proven challenging because road freight has been cheaper and more reliable for the shorthaul journeys that make up most port container movements. The forthcoming opening of the Enfield Intermodal Terminal offers a test case for the shorthaul rail freight market in Sydney.* (p228) This would appear to suggest that investment in intermodal terminal capacity at Moorebank could be considered premature, pending verification that such facilities will in fact be fully utilised, especially by rail rather than road based transport. INSW further comments that: *Even under optimistic projections of modal shift to rail, road will remain the dominant mode for Port Botany freight traffic, and the majority of freight growth over the next 20 years will be conveyed by road…Even were rail to reach a 40 precent mode share by*	As noted in Council's submission, the rail mode share target identified by the NSW government cannot be achieved without the development of IMTs and INSW is supportive of the use of private investment in the development of IMTs, as proposed by SIMTA. The SIS goes on to identify that '*It is likely that major investment in supporting infrastructure around this precinct, given ramp up, will not be required until after 2017* ' (pg 124). The funding commitment to road infrastructure upgrades aligns with the findings of the *Transport and Accessibility Impact Assessment,* prepared for the SIMTA proposal. The *Transport and Accessibility Impact Assessment* clearly identifies the road upgrades that would be required to support the SIMTA proposal as annual TEU throughput at the site increases. Road upgrades to the State owned M5 Motorway/Moorebank Avenue interchange would not be required until the SIMTA proposal is operating at 500,000 TEU throughput per annum. As SIMTA is not predicted to reach an operational throughput of 500,000 TEU which is not predicted to occur until after the timeframe identified in the SIS of 2017 for provision of funding for infrastructure upgrades is consistent with the findings of the *Transport and Accessibility Impact Assessment* prepared for the SIMTA proposal. It is acknowledged that, should the State and the Commonwealth governments choose to adopt a 'whole of precinct' approach to the 'Moorebank Intermodal Precinct', the road upgrade requirements for the	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	2031, road travel will still more than double during this period. The complexities and constraints presented by Port Botany's location, along with its forecast rapid growth…suggest that both modes will need to substantially increase the volumes they carry to ensure the efficiency of the [port supply chain over the next 20 years. Greater focus should be given to accommodating container freight movements by road. This is because road freight will remain the dominant mode (pp 120-121) Nevertheless, INSW recognises that, if rail is to increase its mode share: *The major infrastructure requirement identified to increase the proportion of container freight that moves by rail investment in intermodal capacity…The private sector and the Commonwealth Government have separate schemes for a major intermodal terminal at Moorebank in Sydney's South-West…* *Infrastructure NSW is supportive of the intermodal concept…[but]…**recommends that State public funding for additional intermodal terminal capacity in Sydney (including in relation to supporting infrastructure) be minimised until there is greater clarity on whether the short-haul rail freight market is viable.** (Emphasis added)* *This approach does not contradict either of the proposed developments in the Moorebank Precinct, where project investors propose to fund immediate supporting infrastructure (for example rail lines and precinct roads). Until these facilities demonstrate commercial viability, it would be imprudent to commit significant State capital in wider infrastructure upgrades. Infrastructure NSW assumes that (in line with proponents' estiamtes Moorebank will be developed over the next five years. It is likely that major investment in supporting infrastructure around this precinct, given*	precinct as a whole may vary from those identified for the SIMTA proposal alone. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	ramp up, will not be required until after 2017. (p 124). On p129, INSW notes this supporting infrastructure is estimated to cost $300 million. Given the above comments offered by INSW, Council needs to be assured that, if the SIMTA proposal proceeds in the short to medium term, all essential on and off-site infrastructure upgrade needs are met in a timely fashion, whether by the proponent or the State. Delay in infrastructure provision as intimated by INSW should be opposed – instead the approach taken by Council in its submission on the original proposal (securing essential upgrades prior to operations commencing) should be pursued vigorously.		
	The project proponents only propose to carry out road upgrade works related to Moorebank Avenue (see Statement of Commitment pp 172-3 of IA Report). Council's professional staff have observed that it is unrealistic to assume that traffic exiting or accessing the terminal will all use Moorebank Avenue and that Cambridge Avenue will also be used, with consequent impacts on Campbelltown's road network, and that this situation is likely to be exacerbated by the interplay of traffic between SIMTA and other terminals in the area which is likely to be road rather than rail based.	As discussed above, Campbelltown LGA is mainly serviced by the MIST terminal, and therefore sits largely outside the freight catchment of the SIMTA proposal. Cambridge Avenue would not be used by vehicles accessing the SIMTA site, with the exception of 5% of employee and rigid vehicle trips. The route of travel north-west from the SIMTA proposal, to access the freight catchment, is approximately 3 km via Moorebank Avenue and 11 km via Cambridge Avenue and Glenfield Road and there is no incentive for vehicles to use the longer route. It is also noted in the TfNSW's submission to the Concept Plan EA (CD 13/21056) that the Cambridge Avenue bridge is owned by the Department of Defence, which are contemplating the closure of Cambridge Avenue to through traffic. Should this occur, all traffic associated with the SIMTA proposal would travel north, along Moorebank Avenue. This was also acknowledged in the submission received from TfNSW (November 2013).	Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)
	In addition, the proponents commit to the delivery of the rail connection between the Southern Sydney Freight Line and the SIMTA site *"in the detailed application for the first stage of*	The *Rail Access Report* provides information regarding the proposed rail access to and from the SIMTA site and interaction and integration with existing and planned rail infrastructure and services including SSFL. The	Appendix H *Rail Access Report* (Hyder

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	works". (IA Report, p 172). The IA Report notes that details of the rail infrastructure and its operation, an assessment of its environmental impacts, its compatibility with the wider rail network and consultations required with other entities are yet to be conducted. As such, the delivery of the rail connection appears by no means assured. Rather than considering this aspect of the proposal as part of the first stage of works it may be more appropriate to consider it as a "condition precedent" without which any overall approval should be withheld or become inoperative if the link is not secured within an appropriate timeframe. Alternatively, in the event that Concept Approval is granted, the lodgement of individual Project Applications should be prevented unless and until delivery of the rail link is secured.	report also includes a discussion of future expansionary infrastructure requirements on the SSFL and the likely annual TEU throughput handled at the SIMTA site that may trigger the need for expansionary works, which is identified as when the site is operating at a throughput of 1 million TEU per annum. Section 2.2 of the *Rail Access Report* 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 not only the SIMTA site, but also a future whole of precinct access arrangement, with the MICL site able to access through the same connection point to the SSFL. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. The following Statement of Commitment is included in the EA (refer to Section 18): *The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed planning application for the first stage of works. …* Rail access would be secured by SIMTA through a Connection Agreement and Interstate Access Agreement with ARTC, prior to operation of the rail link and intermodal terminal. As noted in ARTC's submission (21 October 2013), SIMTA is working with ARTC to progress the rail link connection to the SSFL through an Interstate Access Undertaking, which has been accepted by the Australian Competition and Consumer Commission (ACCC). Agreements with ARTC will be secured through the Interstate Access Undertaking, which is not linked to the submission of Project Approval applications.	Consulting, 2013)
	The Draft Freight and Ports Strategy (DFPS) 2013 views the Moorebank Intermodal as a key infrastructure project (p82) with operations due to begin between 2015 and 2017 subject to	The Freight and Ports Strategy has now been finalised and recognises the SIMTA proposal as a key strategic piece of infrastructure, necessary to	Appendix F *Transport and Accessibility*

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	approval and access (p71). It states (p100): *Transport for NSW will support the development of sustainable facilities that create network capacity by:* ▪ *Supporting ARTC's completion of the Southern Sydney Freight Line to connect the proposed intermodal facilities at Moorebank to the Metropolitan Freight Network.* *…* ▪ *Supporting the development of new intermodal terminals to facilitate the import container trade. In this context, intermodal terminal function like inland satellite ports…Consideration of complementary road upgrades is usually necessary to support these new terminals.* The DFPS sets out its targeted outcomes as follows: *The development of new intermodal terminals in…Moorebank…will occur on sites that are supported by dedicated rail freight lines and adequate road connections. Rail lines to port Botany will avoid interaction with passenger services on the RailCorp network and facilitate 24 hour port, rail and terminal operations.* As part of any submission on the current proposal, Council needs to seek assurance that this off site support of infrastructure is in place to support the operation of the terminal at its outset. Whilst it is noted that the proponents purpose to fund road upgrades relatively immediate to the site, more distant road impacts are not adequately addressed in the material available.	achieve the rail mode share target identified by the NSW Government. As discussed above, the *Transport and Accessibility Impact Assessment* identifies the road infrastructure upgrades that would be required to support the SIMTA proposal and the annual TEU throughput at the intermodal at which the upgrades would be required. A timing column has been included in the updated Statement of Commitments, which identifies when the upgrades, as described in the *Transport and Accessibility Impact Assessment*, would be implemented. It is acknowledged that, should the State and the Commonwealth governments choose to adopt a 'whole of precinct' approach to the 'Moorebank Intermodal Precinct', the road upgrade requirements for the precinct as a whole may vary from those identified for the SIMTA proposal alone. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	*Impact Assessment* (Hyder Consulting, August 2013a)
	The importance of the Moorebank Intermodal precinct is emphasised in the DFPS by being identified specifically as a Case Study site 9p101). It notes that there are two proposals for intermodal terminals at Moorebank – one by the Commonwealth	As discussed above, the *Transport and Accessibility Impact Assessment* identifies the road infrastructure upgrades that would be required to support the SIMTA proposal and the annual TEU throughput at the intermodal at which the upgrades would be required. A timing column has been included in	Appendix F *Transport and Accessibility Impact*

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	Government and the current proposal by SIMTA. Importantly, *TfNSW expect the development of these two intermodal terminals in the Moorebank precinct to place significant strain on the surrounding local road network. While not all effects of terminal developments have been identified at this time, initial analysis suggests the following impacts to the local road network:* ▪ *Travel demand on the section of the M5 Motorway between the Hume Highway at Casula and Moorebank Ave is expected to exceed capacity as early as 2016.* ▪ *The absence of west facing ramps from the M5 to the Hume Highway results in a significant number of vehicles using Moorebank Avenue to access the Liverpool CBD.* ▪ *By 2025 growth in background traffic will result in peak spreading and traffic conditions similar to the existing peak period in the Liverpool area and on the M5, persisting for most of the day.* ▪ *Key intersections providing access to the Moorebank intermodal precinct will exceed capacity with volumes, especially of turning vehicles, resulting in extensive delays, with queuing sufficient to disrupt through movement.* *To support the development of the Moorebank intermodal terminals and meet the challenges posed by impact on the local road network, TfNSW is seeking to provide road network upgrades. The specific goals of these upgrades include:* ▪ *Providing additional capacity and traffic reliability on key routes accessing the precinct.* ▪ *Ensuring full access to the precinct for High Productivity Vehicles (HPV), including Higher Mass Limit (HML) vehicles.* ▪ *Managing the needs of the precinct in terms of road access*	the updated Statement of Commitments, which identifies when the upgrades, as described in the *Transport and Accessibility Impact Assessment*, would be developed. Road upgrades to the State owned M5 Motorway/Moorebank Avenue interchange would not be required as a result of the SIMTA proposal until the SIMTA proposal is operating at 500,000 TEU throughput per annum. The funding commitment to road infrastructure upgrades within the SIS aligns with the findings of the *Transport and Accessibility Impact Assessment,* prepared for the SIMTA proposal, as SIMTA is not predicted to reach an operational throughput of 500,000 TEU until Stage 2 is substantially complete. This aligns to the timeframe identified in the SIS of 2017 for provision of funding for infrastructure upgrades is consistent with the findings of the *Transport and Accessibility Impact Assessment* prepared for the SIMTA proposal. It is acknowledged that, should the State and the Commonwealth governments choose to adopt a 'whole of precinct' approach to the 'Moorebank Intermodal Precinct', the road upgrade requirements for the precinct as a whole may vary from those identified for the SIMTA proposal alone. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan. SIMTA is committed to construction of the rail link to the SSFL as the first stage of development: *The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed application for the first*	*Assessment* (Hyder Consulting, August 2013a

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	while addressing negative externalities for the surrounding community and environment. The DFPS indicates that *TfNSW has prepared a Nation Building 2 submission to undertake modelling and economic analysis to determine the optimal road upgrade package to meet the needs of the developed Moorebank intermodal terminal precinct.* It is clear from this commentary that the implications for wider road upgrades to support the Moorebank site are as yet unknown. This view would be supported by reference to the Impact Assessment itself as noted previously. Also, contrary to the assertion by INSW that upgrades are to be funded by the private proponents and cautioning against investment of public funds until viability is proven, the DFPS appears to suggest that, at least initially, TfNSW is to undertake work to determine the need for road upgrades. It is essential that this apparent contradiction is addressed to Council's satisfaction firstly by the guarantee that approval is not granted prior to determination of necessary infrastructure upgrades more remote from the site and secondly that construction of those necessary facilities is secured prior to commencement of operations of the SIMTA proposal.	*stage of works.*	
	The Long Term Transport Master Plan (LTTMP) 2012 notes in relation to Moorebank that *Development of the Moorebank intermodal container terminal precinct will have impacts on the local road network. Initial analysis suggests that traffic on the M5 (between the Hume Highway (M31) at Casula and Moorebank Avenue) could exceed capacity as early as 2016, and capacity will be exceeded at key intersections that provide access to the precinct. We [TfNSW] will*	As discussed above, the *Transport and Accessibility Impact Assessment* identifies the road infrastructure upgrades that would be required to support the SIMTA proposal and the annual TEU throughput at the intermodal at which the upgrades would be required. A timing column has been included in the updated Statement of Commitments, which identifies when the upgrades, as described in the *Transport and Accessibility Impact Assessment*, would be developed. It is acknowledged that, should the State and the Commonwealth	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a

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	work with the Australian Government on a road access strategy for the intermodal terminal precinct (p295) This reinforces the view expressed above that the road infrastructure implications of intermodals at Moorebank are not well understood. It is imperative that such impacts are comprehensively examined and a program in place to adequately address any concerns prior to approval being granted for any intermodal terminal at Moorebank.	governments choose to adopt a 'whole of precinct' approach to the 'Moorebank Intermodal Precinct', the road upgrade requirements for the precinct as a whole may vary from those identified for the SIMTA proposal alone. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	
	Recommendation Three The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately timed upgrade works to Cambridge Avenue to dual carriageway, 1 in 100 year flood free access standard prior to commencement of any intermodal operations on the SIMTA site.	As discussed above, Campbelltown LGA is largely serviced by the MIST terminal, and predominantly sits outside the freight catchment of the SIMTA proposal. Cambridge Avenue would not be used by vehicles accessing the SIMTA site, with the exception of 5% of employee and rigid vehicle trips. The route to travel north-west from the SIMTA proposal, to access the freight catchment, is approximately 3 km via Moorebank Avenue and 11 km via Cambridge Avenue and Glenfield Road, there is no incentive for vehicles to use the longer route. No traffic impacts are predicted on Cambridge Avenue as a result of the SIMTA proposal; hence the upgrades proposed by Council are not appropriate for the SIMTA proposal. It is also noted in TfNSW's submission to the Concept Plan EA (CD 13/21056) that the Cambridge Avenue bridge is owned by the Department of Defence, which is contemplating the closure of Cambridge Avenue to through traffic. Should this occur, all traffic associated with the SIMTA proposal would travel north, along Moorebank Avenue.	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)
	Recommendation Four The State Government and SIMTA be requested to enter into a Planning Agreement with Council to secure the appropriately	No traffic impacts are predicted on Cambridge Avenue or Glenfield Road as a result of the SIMTA proposal as the only a small proportion of light vehicles and rigid trucks would access the site via Glenfield Road / Cambridge Avenue. Construction of a new road between Glenfield Road and	Appendix F *Transport and Accessibility Impact*

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	timed construction of a new road link between the Glenfield Road overbridge and Campbelltown Road to ensure that the traffic related to the SIMTA development does not pass through residential areas as vehicles head in a north westerly direction.	Campbelltown Road is not an appropriate mitigation measure for the SIMTA proposal.	*Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)
	Recommendation Five Council seek assurances from the State Government and proponents prior to granting of any approval that all essential on and off-site infrastructure needs arising from the SIMTA proposal are identified and met in a timely fashion at no cost to Council, with clear responsibilities established for individual components of the infrastructure task.	As discussed above, the *Transport and Accessibility Impact Assessment* identifies the road infrastructure upgrades that would be required to support the SIMTA proposal and the annual TEU throughput at the intermodal at which the upgrades would be required. A timing column has been included in the updated Statement of Commitments, which identifies when the upgrades, as described in the *Transport and Accessibility Impact Assessment*, would be developed. Further, SIMTA is committed to construction of the rail link to the SSFL as the first stage of development: *The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed application for the first stage of works.*	Section 18
	The LTTMP includes a short term action (p299) to improve integration of land use and freight planning. It indicates that TfNSW *Will engage with industry, the community and local councils to develop effective guidelines, information sharing and best*	Section 3.3 of the EA sets out the needs and objectives of the SIMTA proposal and observes that the SIMTA site is *strategically located to utilise existing and future Metropolitan, State and National rail freight and road networks, including the Southern Sydney Freight Line and the M5 and WestLink M7 Motorways* (pg 38).	Section 3.3 Section 18 Appendix F *Transport and Accessibility*

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
	practice partnerships on land use planning for freight. There initiative will seek to resolve issues around local access and ensure that planning decision about the location of businesses, services and housing developments also consider freight logistics needs and network implications. The aim is to maximise the existing freight network, minimise conflicts between local and freight traffic where possible, and promote the development of more efficient supply chains and transport access in local areas by preventing encroachment by incompatible development and sensitive land use (p299). The action is aimed at facilitating the operation of intermodal freight by, for example, preventing encroachment by incompatible development. In contrast, the Moorebank Intermodal proposal represents the incorporation of a major new facility into existing urban setting. Such as, Council should seek detailed discussions with the State Government prior to, or accompanying, any approval as to implications of the terminal for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive spinoffs of the terminal for the local area.	The EA has assessed the impacts associated with the SIMTA proposal and mitigation measures to ameliorate those impacts are listed in the Statement of Commitments, t. As discussed in the EA, no impacts on the Campbelltown LGA as a result of the SIMTA proposal are predicted, as the LGA is largely serviced by the MIST and traffic would not generally travel through the LGA to the site. Noise and air quality impacts from construction and operation of the SIMTA proposal are not predicted given the distance of residential receivers within the LGA from the site. SIMTA is in support of the State Government and local Councils within the vicinity of the project working together to maximise the potential indirect benefits associated with the development of the SIMTA proposal. Additionally, SIMTA is willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	*Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)
	The Draft Metro Strategy (DMS) 2013 notes that the LLTMP: *Sets out the approach and actions to integrate, modernise and grow Sydney's transport infrastructure network. The Metropolitan Strategy for Sydney will maximise the productivity advantages of transport investment with supporting land use that delivers strong economic return and improves Sydney's amenity and way of life. (p54).* The SIMTA proposal, if it were to proceed, represents the retrofit	The SIMTA proposal does not represent a 'retrofit' of an existing facility, but rather the construction and operation of a new intermodal facility and rail link on a site that is strategically located within Sydney's existing metropolitan transport network. The relocation of the DNSDC from the SIMTA site, to the West Wattle Grove site, is scheduled for completion in 2014. The driver for the relocation is the consolidation of Defence activities onto Defence owned land, rather than leased land. Refurbishment of the existing DNSDC site would not achieve the proposed objectives as the site is not connected to the SSFL or arranged in a	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G

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	of a major facility into an existing urban fabric, rather than the integrated forward planning of such a facility together with its surrounding land uses (as noted above in commenting on the LLTMP). As such, the State Government should be asked to commit to detailed discussions with Council regarding the future of the area in the vicinity of the Moorebank proposal, both to ameliorate any adverse impacts and to capitalise on employment opportunities which may also arise from the operation of the facility. Importantly this should involve detailed discussion with Government and operators of the range of transport related facilities in the vicinity, including MIST and the Ingleburn siding and the Southern Sydney Freight Line in order to promote coordinated operations and so maximise their benefit to both Campbelltown and the wider Sydney economy. Such co-operative discussions are in fact foreshadowed in the DMS – see for example Action 27.3 (p74) which indicates that planning for the Moorebank intermodal in order to deliver efficient freight connections should be led by TfNSW but involve Local Councils. **Recommendation Six:** In order to ameliorate any impacts of, and maximise any positive potential from, the SIMTA proposal, Council request the State Government to enter into discussions with Council prior to, or accompanying, any approval as to implications of the terminal for the local area and measures proposed to ameliorate any impacts whilst maximising any potential positive spinoffs of the terminal for the local area.	manner that would meet the warehousing and freight distribution objectives of the SIMTA proposal. The EA has assessed the impacts associated with the SIMTA proposal and mitigation measures to ameliorate those impacts are listed in the Statement of Commitments, As discussed in the EA, no impacts on the Campbelltown LGA as a result of the SIMTA proposal are predicted as the LGA is largely serviced by the MIST and traffic would not generally travel through the LGA to the site. Noise and air quality impacts from construction and operation of the SIMTA proposal are not predicted given the distance of residential receivers in the LGA from the site. SIMTA is in support of the State Government and local Councils within the vicinity of the project working together to maximise the potential positive indirect benefits associated with the development of the SIMTA proposal. Additionally, SIMTA is willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	*Freight Demand Modelling* (Hyder Consulting, June 2013a)
Noise and	The Impact Assessment recommends that detailed noise assessments be undertaken at each development application	SIMTA is committed to carrying out detailed assessment, including monitoring of operational noise, to validate noise models and the ongoing compliance of	Section 18

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
Vibration	stage to confirm the need for, and extent of, any noise mitigation measure required. It recommends that operational noise should be monitored "*at nearby receivers…to validate noise models uses in these assessment´[IA, p76].* The Report does not specify which sites should be monitored in this way. Council should seek to ensure that appropriate monitoring is conducted in the City of Campbelltown to ensure any adverse impacts are identified and managed accordingly. This is all the more important as the forecast noise impacts are only predictions based on modelling and actual impacts could vary given factors such as atmospheric conditions, the nature of equipment used on site etc.	the development. As noted within Council's submission, noise monitoring was undertaken within the suburb of Glenfield to establish background noise levels and the applicable criteria at this location for the SIMTA proposal. Operational noise monitoring, as presented within the Statement of Commitments, would be undertaken to validate the modelling presented in the *Noise Impact Assessment.* The following Statements of Commitment are included in the EA: *The Proponent will carry out detailed assessment when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate models used in these assessments.* *The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum.* The Statement of Commitments has been updated to link the requirement for a noise barrier to the outcomes of the operational noise monitoring: *The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined in response to the operational noise monitoring.* The *Noise Impact Assessment* report (Section 3) identifies four residential and three non-residential sensitive receivers within the vicinity of the SIMTA proposal - located within Wattle Grove, Moorebank, Casula and Glenfield. Impacts on sensitive receivers have been assessed in Section 6 of the report and Section 6.3 of the EA. Residential and sensitive receivers are representative of the catchments within close proximity to the proposed site. Operational noise monitoring would be carried out at nearby sensitive	Appendix I *Noise Impact Assessment* (Wilkinson Murray, August 2013) Submissions Report

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		receiver locations, which would be selected in accordance with the relevant noise impact assessment standards, once the site is operational. The *Noise Impact Assessment* assessed the potential noise impacts associated with the SIMTA proposal, including both day time and night time noise levels associated adverse meteorological conditions (i.e. with a temperature inversion present). The noise impact assessment assumed a 'worst case' operating scenario and found that it was unlikely that operational noise levels will result in noise impact since they are below the 'maximum' levels for all meteorological conditions and are only 4 dBA above the 'satisfactory' levels when temperature inversions are present at the nearest receivers in Wattle Grove. No exceedences were predicted at Glenfield. The *Noise Impact Assessment* found that predicted levels of operational, road traffic and rail traffic noise are all within the established criteria for all nearby receivers. Due to the distances from the proposed SIMTA site, it is not expected that the SIMTA proposal will have a significant noise impact on the City of Campbelltown.	
	Depending on the routing of traffic into and out of the terminal, noise impacts on properties and residents in the City of Campbelltown may be experienced. Given the uncertainty around these traffic flows, possible noise impacts are, as yet, unknown.	The *Transport and Accessibility Impact Assessment* identified only 5% of rigid truck movements and 5% of employee trip movements to travel south from the SIMTA proposal, using Cambridge Avenue, with no container/ B-doubles using this route. The distribution of container and rigid truck movements from the SIMTA site was based on the freight catchment assessment presented in Appendix G, Freight Demand Modelling Report, which has been accepted by TfNSW as representing the origin/destination of the intended freight catchment for the SIMTA proposal. Employee car movements to and from the site were distributed based on the Journey to Work (JTW) and House Travel Survey (HTS) data for the Moorebank catchment, sourced from Bureau of Transport Statistics (BTS). It is also noted in TfNSW's submission to the Concept Plan EA (CD 13/21056) that the Cambridge Avenue bridge is owned by the Department of Defence, which contemplating the closure of Cambridge Avenue. Should this	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting,

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		occur, all traffic associated with the SIMTA proposal would travel north, along Moorebank Avenue. As only 5% of employee trips and 5% of rigid truck movements would travel south from the SIMTA proposal, entering the Campbelltown City Council LGA, noise impacts within the LGA are predicted to be well below the 2 dBA criterion at all residential receivers.	June 2013a)
	The IA Report makes a number of recommendations to help control any noise impacts [p76] including siting buildings to help shield surrounding areas from noise. These recommendations should be supported by Council in the event the proposal is approved.	Noted. The Statement of Commitments have been updated and include: *The Proponent shall consider locating less noise-intensive activities and operations at the north-eastern and south-eastern corners of the site where residences are closest.* *The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined during in response to the operational noise monitoring.*	Section 18 Submissions Report Appendix I *Noise Impact Assessment* (Wilkinson Murray, August 2013)
	The IA Report commits the proponent to carrying out noise monitoring when the terminal is operating "*to validate noise models in the (late detailed assessment"* (IA, p174). Whilst the monitoring of operational noise impacts should be required, Council should seek the extension of any related condition to include the carrying out of any amelioration works shown to be necessary as a result of such monitoring. **Recommendation Nine:** Council request the State Government impose a condition requiring the proponent to undertake necessary ameliorative works if monitoring of operational noise impacts indicates adverse impacts on off-site properties.	SIMTA is committed to carrying out detailed assessment, including monitoring of operational noise, to validate noise models and the ongoing compliance of the development. As noted within Council's submission, noise monitoring was undertaken within the suburb of Glenfield to establish background noise levels and the applicable criteria at this location for the SIMTA proposal. Operational noise monitoring, as presented within the Statement of Commitments, would be undertaken to validate the modelling presented in the *Noise Impact Assessment.* The following Statements of Commitment are included in the EA: *The Proponent will carry out detailed assessment when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate models used in these assessments.*	Section 18 Appendix I, *Noise Impact Assessment* (Wilkinson Murray, 2013)

Aspect	Issue	Clarification / Response	EA Section / Specialist Study reference
		The Proponent will carry out detailed assessments for the subsequent application stages and when the SIMTA proposal is operational, including monitoring of operational noise levels at nearby receivers. The monitoring data should be used to validate noise models used in these assessments. The subsequent assessments should address the environmental assessment requirements, as determined by the approval authority, as a minimum. The Statement of Commitments has been updated to link the requirement for a noise barrier to the outcomes of the operational noise monitoring: *The Proponent should make provision for a noise barrier along the western boundary of the SIMTA site. The requirement for the barrier will be determined during in response to the operational noise monitoring.*	
	Recommendation Ten: Council be consulted in detail as to potential traffic routes into and out of the terminal in order to be satisfied that local noise impacts can, and will, be adequately managed.	The strategic traffic model that has been used to assess SIMTA includes the entire Sydney Metropolitan Region. Heavy vehicle movements associated with the SIMTA proposal would be primarily redistributed to the west of the M5 Motorway/Moorebank Ave interchange in Liverpool, partly to the South West (from the M5 Motorway via Hume Highway and M7 Motorway) and to the industrial areas in Western Sydney. The distribution of vehicles adopted for the *Transport and Accessibility Impact Assessment* is based on Journey to Work (JTW) and House Travel Survey (HTS) data for the Moorebank catchment sourced from Bureau of Transport Statistics (BTS) and the *Freight Demand Modelling Report*, included as Appendix G of the EA. It is noted that the submission received from TfNSW (November 2013) states that TfNSW is satisfied that the future trends in container origin/destination in Sydney and the identification of the SIMTA proposal's freight catchment area and freight split has been adequately addressed at the Concept Plan level. It is also noted that the trip to access the Hume Highway, heading north-west from the SIMTA site, via Cambridge Avenue and Glenfield Road is a distance of approximately 11 km, while the trip via the Hume Highway via Moorebank Avenue and the M5 Motorway is approximately 3 km. There would be no	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a)

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		incentive for vehicles to take the longer route. As noted within Council's submission, the SIMTA proposal will follow a staged application process and Council will have opportunity to identify and address concerns in relation to the proposal on a staged basis (Ian Reynolds, 2013). SIMTA is committed to consulting with relevant agencies throughout the design development and project approval process for the SIMTA proposal.	

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Air Quality	The IA sets out existing environmental conditions [p110]. As with noise monitoring one monitoring site is located within Glenfield. The IA identifies potential air quality impacts of the proposal as [p111] short term pollutant peaks arising from train movements. It indicates that these "*would quickly disperse to concentrations…unlikely to cause exceedance of air quality goals"* [IA, p111]. It goes on to claim that "*the operation of the SIMTA proposal is expected to have net positive impact on regional air quality and result in an overall reduction in emissions to arished"* [p111]. This claim is based on the reduction in heavy goods traffic using the M5 as a result of increased usage of rail; a reduction in greenhouse gas emissions is also claimed as a result of increased rail v road transport. These claims are set within the context of a particular set of transport assumption. As noted above during the discussion of the strategic context of the SIMTA proposal, the related transport infrastructure outcomes are as yet uncertain. As a worst case scenario, were the SIMTA proposal to proceed without necessary supporting infrastructure, it would function as a large road freight terminal with consequent diminution of air quality. In order for Council to be assured of acceptable air quality outcomes, appropriate transport infrastructure needs to be guaranteed and in place at the right time. **Recommendation Eleven:** Council seeks assurances from the State Government that appropriate infrastructure will be put in place at the right time to ensure acceptable regional and local air quality outcomes.	The *Transport and Accessibility Impact Assessment* 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. By transporting freight by rail from Port Botany to the proposed SIMTA Facility the proposal will reduce the number of trucks currently travelling on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site[1], whereas one truck would likely only be able to transport on average, 2 TEU[2] per trip (refer to Section 6.6.2 of *Transport and Accessibility Impact Assessment*). The resulting reduction in congestion and heavy vehicle movements along the M5 Motorway between Port Botany and Moorebank is expected to be in the order of 2,700 vehicles per day. SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the current *Transport and Accessibility Impact Assessment* reflects the outcomes of these discussions. This assessment is considered suitable based on the information currently available for the proposal. The air quality impacts at the regional level have been considered in Section 8 of the *Air Quality Impact Assessment*. Section 8.2.2 of this report found that there would be a reduction in emissions of NO_x, PM_{10} and CO_2 associated with the transfer of freight from road to rail. Section 5 of the *Greenhouse Gas Assessment* demonstrates how the Moorebank facility will improve freight transport efficiency within the Moorebank freight catchment. Traffic projections suggest that freight road transport from Port Botany will be reduced by approximately 13 million annual vehicle kilometres as a result of the SIMTA proposal when it is fully operational. The resulting increase in rail transport as a result of the facility is projected to be approximately 332,000 KVT.	Appendix R *Greenhouse Gas Assessment* (Hyder Consulting, June 2013h) Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling* (Hyder Consulting, June 2013a) Appendix Q Air Quality Impact Assessment – Impact Assessment Report (Pacific Environment, 2013)

[1] A conservative estimate of 81 TEU per train was used to allow for some redundancy
[2] A conservative estimate of 1.6 TEU were used in the *Transport and Accessibility Impact Assessment* report

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		The report also concludes 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 (81 TEU) by a single train journey as opposed to a single truck journey (2 TEU)."* As discussed above, the *Transport and Accessibility Impact Assessment* identifies the road infrastructure upgrades that would be required to support the SIMTA proposal and the annual TEU throughput at the intermodal at which the upgrades would be required. A timing column has been included in the updated Statement of Commitments, which identifies when the upgrades, as described in the *Transport and Accessibility Impact Assessment*, would be developed. Road upgrades to the State owned, M5 Motorway would not be required until the SIMTA proposal is operating at 500,000 TEU throughput per annum. The funding commitment to road infrastructure upgrades within the SIS aligns with the findings of the Transport and Accessibility Impact Assessment, prepared for the SIMTA proposal, as SIMTA is not predicted to reach an operational throughput of 500,000 TEU. The predicted aligns to the timeframe identified in the SIS of 2017 for provision of funding for infrastructure upgrades is consistent with the findings of the Transport and Accessibility Impact Assessment prepared for the SIMTA proposal. The following Statement of Commitment is included in the EA (refer to Section 18): *The Proponent commits to the delivery of the rail link between the SIMTA site and the Southern Sydney Freight Line in the detailed planning application for the first stage of works. …* Rail access would be secured by SIMTA through a Connection Agreement and Interstate Access Agreement with ARTC, prior to operation of the rail link and intermodal terminal. As noted in ARTC's submission (21 October 2013), SIMTA is working with ARTC to progress the rail link connection to the SSFL through an Interstate Access Undertaking. Agreements with ARTC will be	

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		secured through the Interstate Access Undertaking, which is not linked to the submission of Project Approval applications. SIMTA is in support of the State Government and Local Councils within the vicinity of the project working together to maximise the potential positive multipliers associated with the development of the SIMTA proposal. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	
	The analysis reported in the IA is broad scale. Assuming rail is used to freight goods into the terminal, depending on the local traffic routes used to distribute goods out from the terminal, there could be specific localised air quality impacts on areas within the City of Campbelltown. The modelling for the proposal reporting in the IA only models impacts arising from truck traffic exiting the terminal along Moorebank Avenue to access the M5. As has already been seen, the off-site traffic modelling has concentrated on areas close to the SIMTA site and the more distant traffic impacts are uncertain and potentially underestimated. As a result it is not possible to assess at this time the nature and extent of potential local air quality impacts arising from heavy transport sourced from the terminal if that traffic uses routes other than Moorebank Avenue. Council needs to be consulted in detail as to potential traffic routes out of the terminal in order to be satisfied that this issue	As discussed above, Campbelltown LGA is mainly serviced by the MIST terminal, and therefore sits largely outside the freight catchment of the SIMTA proposal. Cambridge Avenue would not be used by vehicles accessing the SIMTA site, with the exception of 5% of employee and rigid vehicle trips. The route to travel north-west from the SIMTA proposal, to access the freight catchment, is approximately 3 km via Moorebank Avenue and 11 km via Cambridge Avenue and Glenfield Road and there is no incentive for vehicles to use the longer route. Section 6.7 of the *Transport and Accessibility Impact Assessment* demonstrates the distribution of trips generated by the SIMTA trucks and employee cars. The *Transport and Accessibility Impact Assessment* 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	Appendix F *Transport and Accessibility Impact Assessment* (Hyder Consulting, August 2013a) Appendix Q *Air Quality Impact Assessment – Impact Assessment* Report (Pacific Environment, 2013)

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	can, and will, be adequately managed.	is minor 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. The *Air Quality Impact Assessment* for the SIMTA proposal was prepared in accordance with the NSW Environmental Protection Agency (EPA) *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (NSW DEC, 2005). As noted within Council's submission, the SIMTA proposal will follow a staged application process and Council will have opportunity to identify and address concerns in relation to the proposal on a staged basis (Ian Reynolds, 2013). SIMTA is committed to consulting with relevant agencies throughout the design development and project approval process for the SIMTA proposal.	
Stormwater and Flooding	The SIMTA site drains both to the east and west. The western side of the site drains to the Georges River by a concrete channel. The eastern side drains to Anzac Creek which is also within the Georges River catchment. Council offices advise that the Georges River is a valuable environmental asset within the context of the greater Sydney Basin. The River and its tributaries (including Anzac Creek) provide important habitat for a range of threatened species and vulnerable ecological communities. The River Health Monitoring Program (Georges Rive Combined Councils Committee) has recently rated the river health within the area as good, however this rating has been variable over time and is anecdotally dependent on rainfall. River health noticeably decreases downstream from the site.	The *Riparian Assessment* identifies and assesses the potential impacts to the Anzac Creek and Georges River riparian zones arising from the proposed SIMTA proposal. A range of water quality measures are proposed to mitigate the potential impacts of the SIMTA proposal, during both the construction and operational phases. Mitigation measures currently proposed to minimise impacts of construction in riparian areas include installation of appropriate drainage controls and design of rail crossings in accordance with fish passage guidelines. A commitment is included within the Statement of Commitments to develop and implement a Soil and Water Management Plan during the each construction stage of the SIMTA proposal. As described in the EA, this would be developed in accordance with *Managing Urban Stormwater Soils and Construction*, Vol. 1 (Landcom 2004), 2A and 2D (DECC). Water sensitive urban design elements would be adopted during the development of detailed design for the proposal	Section 18 Appendix K *Riparian Assessment* (Hyder Consulting, June 2013d) Appendix O *Stormwater and Flooding Environmental Assessment* (Hyder Consulting,

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		to minimise impacts on water quality throughout the operational phase. The following commitments are contained within the EA: *Water quality and quantity issues will be managed during the construction phase through the implementation, inspection, and maintenance of best practice soil and water management techniques which be defined in the CEMP for sedimentation and erosion control during construction.* *Water Quality and quantity issues will be managed during the operation phase through the implementation, inspection and maintenance of Water Sensitive Urban Design (WSUD) measures such as rainwater tanks, grass filter strips, wales and bio retention.* *The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standards outlined in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	June 2013f)
	Drainage modelling in the IA report indicates that, with appropriate on-site measures, drainage flows from the site after it has been developed would be no greater than current flows from the site. These measures would need to be assessed in detail and conditioned as part of any subsequent development approval. Provided this is done, the quantum of water flows from	The *Flood Study and Stormwater Management* report provides estimates of peak flows downstream of the site for a range of recurrence intervals. It is noted that modelling for the site indicates that the volume and velocity of surface flows from the site would be static or less than current outflows, including for flows into the Georges River and Anzac Creek. Further, a *Stormwater and Flooding Environment Assessment* has been prepared to assess the potential impact of stormwater and floodwater on erosion and	Appendix K *Riparian Assessment* (Hyder Consulting, June 2013d)

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	the site should not adversely impact on the City of Campbelltown.	sediment mobilisation for the construction and operation phases of the SIMTA proposal. This report states: *An assessment of engineering design for water management on the SIMTA site during operational stages determined that water quality and quantity of discharge flows from the site would be maintained. The adoption of the identified design water structures for stormwater control and flood detention would match or improve pre-development flow rates for a range of storm occurrence intervals and durations. This would provide a nil net effect on downstream flooding and associated stormwater issues such as scour and sedimentation of watercourses (Anzac Creek and the Georges River) and their channel and bank structures.* Civil design drawings showing the proposed location of on-site detention and the accompanying report, *Flood Study and Stormwater Management* 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. The following Statement of Commitment is included in the EA: *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.*	Appendix O *Stormwater and Flooding Environmental Assessment* (Hyder Consulting, June 2013f) Appendix P *Flood Study and Stormwater Management Assessment* (Hyder Consulting, 2013)
	In terms of water quality, potential impacts arising from construction may include "*increased turbidity, reduction in water*	The *Flood Study and Stormwater Management r*eport contains indicative design and location details of pre-treatment and bio-retention systems to be	Section 18 Appendix O

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	body temperatures and reduction in dissolved oxygen, detrimentally impacting fish habitat in George River…" [IA, p103] and degradation of aquatic habitats and obstruction to fish passage could arise from activities such as diversion of flows, erosion, removal of shade trees, sedimentation and inappropriate design of structures [IA, p104]. Council offers note that in order to best preserve the river and its associated biodiversity it is recommended that stormwater and runoff be appropriately treated onsite, including the installation and operation of water quality improvement devises such as water sensitive urban design. Accordingly, with appropriate measures designed and incorporated in any conditions of consent, these impacts would be able to be minimised or eliminated, with no adverse impact on the Georges River or the City of Campbelltown.	implemented as flood and stormwater mitigation measures. Figure C1 within Appendix C: Music Model Layout and Parameters 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. Section 4.1.1.2 of the *Flood Study and Stormwater Management* report notes that the overall stormwater design for the SIMTA proposal will seek to: ▪ *Provide drainage facilities which minimise requirements for in-ground pipework and provide facilities for stormwater detention and Water Sensitive Urban Design.* The following commitments are contained within the EA: *Water quality and quantity issues will be managed during the construction phase through the implementation, inspection, and maintenance of best practice soil and water management techniques which be defined in the CEMP for sedimentation and erosion control during construction.* *The Proponent will incorporate stormwater quantity and quality management measures into the detailed applications in accordance with the objectives and performance standards outlined in the Stormwater and Flooding Environmental Assessment report and including:* ▪ *Preparation of a Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) for both the construction and operation phases.* ▪ *Implementation of management plan strategies prior to commencement of the staged construction phase.* ▪ *Monitoring and review performance of sediment and water control structures during construction and operation phases.*	*Stormwater and Flooding Environmental Assessment* (Hyder Consulting, June 2013f) Appendix P *Flood Study and Stormwater Management Assessment* (Hyder Consulting, 2013) Submissions Report
Hazards and	Depending on activities carried out on the SIMTA site	The *Hazards and Risk Assessment* (Appendix L) identified the potential for a	Appendix L

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Risks	subsequent to any approval, there is a potential for impact on areas of Campbelltown City. Risk could arise from the nature of goods transported to and from, and stored on, site, asbestos from demolitions and removal of existing structures and bushfire impacts.	range of materials to be handled at the site and the relevant legislative requirements and policies that would be invoked to address the risk. Asbestos risk during construction is also addressed in this report. These are incorporated into the following Statements of Commitment: *The Proponent will develop an asbestos management plan for the SIMTA proposal containing a risk assessment undertaken in accordance with Code of Practice for the Management and Control of Asbestos in the Workplace (NOHSC, 2005).* *Where the management plan recommends the removal of asbestos from site all works will be undertaken in accordance with the Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005), including the development of an asbestos removal control plan and an emergency plan.* Notification requirements for the removal of asbestos are addressed in the guidelines identified and would be implemented as the legislation prescribes. The transport of hazardous materials is regulated in NSW and is the subject of legislation that is administered by the Office of Environment and Heritage (OEH). The legislative system for managing the transport of dangerous goods by road and rail are: ▪ Dangerous Goods (Road and Rail Transport) Act 2008. ▪ Dangerous Goods (Road and Rail Transport) Regulation 2009. ▪ Australian Dangerous Goods Code. As discussed in the *Hazards and Risk Assessment* the types of goods received at the site would be constrained by a number of factors, including the types of goods that are permitted to be transported on the SSFL and those goods which are containerised. This means that items such as explosives and flammable gases would not be transported to the SIMTA proposal, regardless of the transport routes adopted. A PHA will be undertaken for each stage of the development, as required by the State approval process and *State Environmental Planning Policy No 33- Hazardous*	*Hazards and Risks Assessment* (Hyder Consulting, June 2013d)

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		and Offensive Development. The *Hazards and Risk Assessment* (Appendix L) identified the potential for bushfires to impact the SIMTA site and the relevant legislative requirements and policies that would be invoked to address the risk. It is noted that the SIMTA site will be protected from the impact of fires from off-site by a 15 metre asset protection zone. The following Statements of Commitment are included in the EA: *The Proponent commits to incorporating the key objectives identified by the Rural Fire Service (RFS) into relevant future design stages.* *The Proponent commits to the development of a Bushfire Management Plan for both the construction and operational phases of the SIMTA proposal that aligns with the requirements of the local RFS Bushfire Management Committee operational plans of management.* *The Proponent will where applicable implement…control of performance of hotworks on total fire ban days during construction and operation, particularly within any defined asset protection zones.*	
	Asbestos risks can and should be managed as part of any competent demolition program. Accordingly, in the event of subsequent detailed project approvals, stringent conditions should be applied to control any asbestos materials found on site. Council should seek to be consulted in this regard to ensure that, if off-site transportation of asbestos is proposed to use any of the Campbelltown road network as part of any demolition program, this is carried out in a manner designed to eliminate any residual risk to Campbelltown residents. **Recommendation Twelve:** In the event that the proposal proceeds to be subsequent detailed project approval stages, stringent conditions should be	The *Hazards and Risk Assessment* (Appendix L) identified the potential for contamination on the site and the relevant legislative requirements and policies that would be invoked to address the risk. These are incorporated into the following Statements of Commitment: *The Proponent will develop an asbestos management plan for the SIMTA proposal containing a risk assessment undertaken in accordance with Code of Practice for the Management and Control of Asbestos in the Workplace (NOHSC, 2005).* *Where the management plan recommends the removal of asbestos from site all works will be undertaken in accordance with the Code of Practice for the Safe Removal of Asbestos (NOHSC, 2005), including the development of an asbestos removal control plan and an emergency plan.*	Appendix L *Hazards and Risks Assessment* (Hyder Consulting, June 2013d)

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	applied to control any asbestos materials found on site. Council should be consulted in this regard to ensure that, if off-site transportation of asbestos is proposed to use any of the Campbelltown road network as part of any demolition program, this is carried out in a manner designed to eliminate any residual risk to Campbelltown residents.	Notification requirements for the removal of asbestos are addressed in the guidelines identified and would be implemented as the legislation prescribes. The removal of asbestos would be carried out in accordance with the *Model Code of Practice – How to Safely Remove Asbestos* (Safe Work Australia, 2011) guidelines. It is noted that asbestos material would be required to be disposed of at an off-site licensed facility. The nearest facility licensed to accept asbestos material is located to the north-west of the SIMTA site and would therefore not require transportation via the Campbelltown Road network. As noted within Council's submission, the SIMTA proposal will follow a staged application process and Council will have opportunity to identify and address concerns in relation to the proposal on a staged basis (Ian Reynolds, 2013). SIMTA is committed to consulting with relevant agencies throughout the design development and project approval process for the SIMTA proposal.	
	Control of dangerous goods on, and travelling to and from, the SIMTA site can only be addressed on a case by case basis in the event that the proposal proceeds. The IA [pp 92-3] proposes measures which should be applied to control the potential hazardous materials. It is considered that Council should be consulted during the development of such measures so that, where relevant and particularly if the local Campbelltown road network is used to transport any such material, Council can be aware of, and be in a position to manage, any situations which may arise. **Recommendation Thirteen:** In the event that the proposal proceeds to subsequent detailed project approval stages, stringent conditions should be applied to control dangerous goods. As a first step, measures proposed in the IA report (pp 92-3) and accepted by the proponent in its Draft	The transport of hazardous materials is regulated in NSW and is the subject of legislation that is administered by the Office of Environment and Heritage (OEH). The legislative system for managing the transport of dangerous goods by road and rail are: ▪ Dangerous Goods (Road and Rail Transport) Act 2008. ▪ Dangerous Goods (Road and Rail Transport) Regulation 2009. ▪ Australian Dangerous Goods Code. As discussed in the *Hazards and Risk Assessment* the types of goods received at the site would be constrained by a number of factors, including the types of goods that are permitted to be transported on the SSFL and those goods which are containerised. This means that items such as explosives and flammable gases would not be transported to the SIMTA proposal, regardless of the transport routes adopted. A PHA will be undertaken for each stage of the development, as required by the State approval process and *State Environmental Planning Policy No. 33-*	Appendix L *Hazards and Risks Assessment* (Hyder Consulting, June 2013d)

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	Statement of Commitments (pp176-7 of the IA Report) should be applied to any Concept Approval. Council must be consulted during the development of such measures so that, where relevant and particularly if the local Campbelltown road network is used to transport any such material, Council can be aware of , and be in a position manage, any situation which may arise.	*Hazardous and Offensive Development*. As discussed above, Campbelltown LGA is mainly serviced by the MIST terminal, and therefore sits largely outside the freight catchment of the SIMTA proposal. Cambridge Avenue would not be used by vehicles accessing the SIMTA site, with the exception of 5% of employee and rigid vehicle trips. The route to travel north-west from the SIMTA proposal, to access the freight catchment, is approximately 3 km via Moorebank Avenue and 11 km via Cambridge Avenue and Glenfield Road and there is no incentive for vehicles to use the longer route. It is also noted in TfNSW's submission to the Concept Plan EA (CD 13/21056) that the Cambridge Avenue bridge is owned by the Department of Defence, which is contemplating the closure of Cambridge Avenue. Should this occur, all traffic associated with the SIMTA proposal would travel north, along Moorebank Avenue. Transport of dangerous or hazardous materials through the Campbelltown LGA is not predicted as a result of the SIMTA proposal. As noted within Council's submission, the SIMTA proposal will follow a staged application process and Council will have opportunity to identify and address concerns in relation to the proposal on a staged basis (Ian Reynolds, 2013). SIMTA is committed to consulting with relevant agencies throughout the design development and project approval process for the SIMTA proposal.	
	It is not anticipated that bushfire would pose any particular threat to the SIMTA operation provided appropriate building design and layout is used. However, in relation to dangerous goods issue noted above, specific attention should be taken in regard to controlling any risk which might arise from combustion of such goods and mitigating any adverse impacts distant from the site.	The *Hazards and Risk Assessment* (Appendix L) identified the potential for bushfires to impact the SIMTA site and the relevant legislative requirements and policies that would be invoked to address the risk. It is noted that the SIMTA site will be protected from the impact of fires from off-site by a 15 metre asset protection zone. The following Statements of Commitment are included in the EA: *The Proponent commits to incorporating the key objectives identified by the Rural Fire Service (RFS) into relevant future design stages.* *The Proponent commits to the development of a Bushfire Management Plan*	Section 18 Appendix L *Hazards and Risks Assessment* (Hyder Consulting, June 2013d)

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		for both the construction and operational phases of the SIMTA proposal that aligns with the requirements of the local RFS Bushfire Management Committee operational plans of management. *The Proponent will where applicable implement…control of performance of hotworks on total fire ban days during construction and operation, particularly within any defined asset protection zones.* 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. The transport of hazardous materials is regulated in NSW and is the subject of legislation that is administered by the Office of Environment and Heritage (OEH). The legislative system for managing the transport of dangerous goods by road and rail are: ▪ Dangerous Goods (Road and Rail Transport) Act 2008. ▪ Dangerous Goods (Road and Rail Transport) Regulation 2009. ▪ Australian Dangerous Goods Code. A PHA will be undertaken for each stage of the development, as required by the State approval process and *State Environmental Planning Policy No 33- Hazardous and Offensive Development*. Once the level of risk has been identified, the aim will be to reduce the risk to as low as possible through the application of specific management procedures that will form part of the framework for managing risks. Tenants would also be required to consider the risk and management of spills of any materials they propose to handle on site, should they occur.	
Visual Impact	Given the nature of the existing uses on and around the SIMTA site, the IA indicates that there will be no adverse impact of the SIMTA proposal from lands within the City of Campbelltown. It also indicates that control of light spillage could be gained with	A *Visual Impact Assessment* has been prepared to assess the visual impacts of the SIMTA proposal. 40 key locations within the surrounding area were assessed for visual impact. Mitigation measures to reduce the visual impact are outlined in Section 13.3.1 of the EA. The *Visual Impact Assessment* also	Appendix U *Visual Impact Assessment* (Reid Campbell,

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	appropriate design. The IA does note that there is the potential for cumulative impact on local visual amenity if other intermodal and related proposals proceed in future. Accordingly Council should see to be consulted on any such proposal in order to protect the interest of its residents. **Recommendation Fourteen:** Council seek a commitment from the State Government that it will be consulted on any additional proposals in the Moorebank precinct so that Council is in a position to assess the visual impact of these proposal in order to protect the interest of its resident's	considered the potential cumulative visual impacts associated with the MICL proposal, which is presented in Section 9 of the report. Section 13.3.1 of the EA states: *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.* It is noted that the prominent viewpoints identified within the *Visual Impact Assessment* are not within the Campbelltown LGA. Views 29, R02, R03, R04 and R05 present viewpoints from within the Campbelltown LGA and demonstrate the minimal visual impact the SITA proposal will have on Campbelltown City Council area. The assessment concludes that: *The proposed landscape treatments would reduce the visibility of the development and improve the overall visual amenity of the site and locality.* Due to the distances from the proposed SIMTA site, it is not expected that the SIMTA proposal will have a visual impact on the City of Campbelltown. SIMTA is in support of the State Government and Local Councils within the vicinity of the project working together to maximise the potential positive multipliers associated with the development of the SIMTA proposal. SIMTA are willing to participate in precinct planning and development on a 'whole of precinct basis' for redevelopment of the Moorebank precinct as an intermodal and warehousing precinct. SIMTA acknowledges that there would	June 2013b)

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		be benefits to developing a 'whole of precinct' approach to support the proposed intermodal terminals and will work with all relevant agencies to successfully deliver the strategic outcomes identified in the NSW State strategic plans, including the NSW State Infrastructure Strategy, NSW Freight and Ports Strategy and the Long Term Transport Management Plan.	