Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Aboriginal Heritage	Holsworthy army reserve	PS26	The Holsworthy army reserve has over 1000 Aboriginal historical sites which would be impacted by the Moorebank Intermodals. Diesel emissions will impact Aboriginal sites.	Aboriginal consultation was undertaken with registered parties and included the Tharawal Local Aboriginal Land Council, Cubbitch Barta Native Title Claimants, Darug Tribal Aboriginal Corporation, Darug Aboriginal Cultural Heritage Assessments, Tocomwall and Darug Land Observations. The outcomes of this consultation concluded that the SIMTA proposal is not considered likely to impact any Aboriginal cultural heritage values. Mitigation measures to reduce the risk of damaging unexpected artefacts as a result of excavation, grading or the use of metal tracked or heavy vehicles, are outlined in Section 12.3.1 of the EA. Investigation and potential impacts will be assessed in greater detail in association with the subsequent stages of planning approval for both Non-Indigenous and Indigenous heritage items. The following Statement of Commitment is included in the EA: *Undertaking further archaeological assessment and investigation or monitoring, where required in areas designated as having archaeological potential that would be impacted by the proposal. The Statement of Heritage Impacts (SoHIs) for each stage should address the archaeological potential of the development area for each stage.* Section 13.3 of the *Aboriginal Cultural Heritage Assessment* concludes that areas that were not assessed within the SIMTA site are not considered likely to contain Aboriginal objects due to historical disturbance. Further advice from archaeologists would be provided regarding appropriate action should any unexpected archaeological deposits be encountered.	Section 18 Section 12.3.1 Appendix S *Aboriginal Cultural Heritage Assessment - Part 3A Concept Application* (AHMS, 2012).
Air Quality	Particulate matter	PS19	What increase in PM10 and PM2.5 will occur at different locations in the local environment, arising from all sources related to the proposed Intermodal. What increases in PM10 and PM2.5 will occur arising from combined effects of the proposed intermodal and the MPO intermodal. Will the increases in PM10 and PM2.5 push the levels of PM10 and PM2.5 (in any location) above the guidelines by the WHO. What PM10 and PM2.5 levels would be recorded if the Intermodal facility was to be located in another area of Sydney, rather than in said area.	Incremental and cumulative Particulate Matter (PM) has been recorded for sixteen receptor locations in the local environment (Section 6.3 and 6.4 of the *Air Quality Impact Assessment*). The analysis shows that the SIMTA proposal would not result in any additional exceedances of the impact assessment criteria for PM10 or advisory reporting standards for PM2.5. The cumulative impact of the 1 million TEU shared catchment for the SIMTA and MICL proposals was assessed and concluded that the impacts would not exceed the criteria for PM10 or advisory reporting standards for PM2.5.	Appendix Q *Air Quality Impact Assessment* *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013).
Air Quality	Validity of the study	PS12, PS19, PS25, PS26	There is a question of validity as to the outcome of the air quality studies. The majority of the data was obtained from the EPA Rose Street Liverpool facility, which has been non-compliant since 2006 (as trees have grown since establishment of the station). Therefore the data collected by the proponent will be incorrect. Even with the incorrect air quality figures PM10 was exceeded every year since 2000, PM2.5 was exceeded in 9 out of the last 10 years. In addition, the studies referred to in the EA are based on figure from 2009 which is 4 years ago. Figures should be based on 2013 data.	The *Air Quality Impact Assessment* report includes data from 2007 to 2012. The report acknowledges these exceedences and notes that they resulted from isolated, regional dust storms. The modelling presented for the assessment of the SIMTA proposal applied assumptions based on the assessment prepared for intermodal facility at Enfield as detailed operational data was not available at the time of preparing the impact assessment report. Where more recent data is available it has been adopted within the report.	Section 11.3 Appendix Q *Air Quality Impact Assessment* *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013).
Air Quality	Air pollution and Cumulative impacts	PS12, PS19, PS26 PS2, PS12, PS14, PS17, PS26, PS2, PS6, PS10, PS12, PS15, PS17, PS22, PS26, PS19 PS2, PS25	The proposed site is already heavily polluted. The addition of 2600+ heavy vehicles per day and 21 diesel locomotives will exacerbate this problem. It has been recorded in the local area, a pollution rate of 20.22 which is over the World Health Organisation's maximum of 20. The area close to the Georges River retains air borne pollutants especially at night. The proceeds of burning or other emissions seem not to disperse, instead hanging within the Wattle Grove district. The area is characterised by poor wind flow (unlike the area around Port Botany which has high wind flow), reducing dispersion rates. In addition, Liverpool is in a basin causing the pollutants to sit for some time without being blown away. Conversely, on days with high winds, many thousands of residents would be affected, right down to Campbelltown. The proposal will impact air quality in the residential area due to the increase amount of trucks and there are already too many as it is. Air pollutants (including diesel fumes, particulates and dust) will be emitted from the SIMTA site and the proposed freight activities on a 24 hour basis. Local residents will be negatively impacted by air quality reductions, even if net benefits for Sydney Regional Air Quality are achieved. The M5 Motorway, Hume Highway and other major roads already produce and contribute to heavy local air pollution loads in the area, which will be exacerbated by the SIMTA project. This will be worsened by heavy vehicles having to stop and start at 14 sets of traffic lights.	The *Air Quality Impact Assessment* includes additional information on the potential air quality impacts associated with the SIMTA proposal. Data generated from dispersion model inputs is included within the report. The methodology in Section 4.1 of the Report includes all assumptions used in the air quality assessment. Section 4 of the report includes details on the existing air quality of the surrounding area. Results, as outlined in Section 6 of the report, have been based on both incremental and cumulative concentrations of pollutants, incorporating the existing concentrations. The assessment concludes that concentrations for NO2 and 24-hour PM concentrations are lower than the relevant impact assessment criteria. The *Air Quality Impact Assessment* includes additional information, design and operations refinements, and concluded that 'The regional impacts of the SIMTA proposal were determined by comparing its marginal effects on emissions from road vehicles (articulated trucks only) and railway locomotives on the Port-Botany-Moorebank corridor. The assessment shows an overall net reduction in emissions of NO2 and PM as a result of the SIMTA proposal.' As outlined in the *Transport and Accessibility Impact Assessment* , traffic generated by the proposal outside the 'core area' (the area within close proximity to the SIMTA site) is not expected to have a significant impact and is expected to integrate into existing traffic. Overall, the regional air quality will improve as a result of the SIMTA proposal due to reduced truck movements from Port Botany. An assessment of net air quality for the Sydney Region has been included in the *Air Quality Impact Assessment* . However, the specific movements beyond Moorebank Avenue of traffic have not been considered necessary for the assessment. Health impacts of the SIMTA proposal, including those associated with diesel emissions, have been assessed within a *Preliminary Screening Health Risk Assessment* (Appendix W) and are discussed in Section 15.2 of the EA. Measures to mitigate impacts on air quality that would be adopted for the SIMTA proposal are outlined in Section 11.3. The assessment undertaken for the EA, including air quality impact assessment, has indicated a low health risk associated with the proposal. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards. Additional impact assessments will be undertaken for the subsequent stages of planning approval.	Sections 11.3, 5.3 and 15.2 Appendix Q *Air Quality Impact Assessment* *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013) Appendix F *Transport and Accessibility Impact Assessment -Transport and Accessibility Impact Assessment* (Hyder Consulting, 2013a) Appendix W *Preliminary screening health risk assessment and literature review* (Toxikos, November 2012)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Air Quality	Locomotives	PS12, PS26	The locomotives used are very old and have a high level of emissions, as are many of the heavy vehicles. The older freight locomotives have pollution equal to 140 diesel trucks.	The locomotives used to transport freight to the SIMTA site are expected to meet and improve on the US EPA Tier 2 and 3 emissions standards. Unlike traditional locomotives, which have a long shutdown/restart process that provides a dis-incentive to turn the locomotive off, the proposed locomotives will be able to be restarted quickly, reducing idling impacts. As a result, diesel emissions from locomotives on site are expected to be below emissions standards and for brief periods of time.	Section 11.3 Appendix Q *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013)
Air Quality	Traffic modelling and air pollution	PS25	Traffic estimates for pollution are thirty times lower than they should be (TfNSW states the number of trucks is ten times greater than used. Calculations for the induced traffic should also be added).	Modelling is based on real life data and has been developed in consultation with RMS. The model has been applied to intersections likely to be affected by the SIMTA proposal, with local and regional growth factored into the future traffic volumes. The *Transport and Accessibility Impact Assessment* includes a comprehensive breakdown of the method of calculation used to derive the estimated 2,638 truck movements (included heavy articulated and non-articulated vehicles) generated by the site operations (Appendix D to the *Transport and Accessibility Impact Assessment*). SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the report reflects the outcomes of these discussions. Section 6.6 of the *Transport and Accessibility Impact Assessment* outlines the sensitivity method and results.	Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix G *Intermodal Freight Terminal Traffic Generation Rates report undertaken by Aurecon* (August 2011).
Biodiversity	Fauna endangered species	PS4, PS26	No consideration of the faunal component of the Endangered Ecological Communities has been made. In particular, the proposal will fragment populations of Bush Rat, Swamp Rat and Eastern Long-nosed Bandicoot which are among or possibly the last populations of these species in Cumberland Plain Woodland and Castlereagh Woodland EECs. Diesel emissions would decimate many threatened and vulnerable species in the Cumberland Woodland Plains. The ecological report from SIMTA downgrades the ecological value of the area. For example, the eastern bent wing will have to forage elsewhere and the powerful owl would desert the area, showing the environmental impact on the area. If the environmental balance is disrupted it could have a massive impact on the area.	The SIMTA proposal will include removal of a small area of threatened ecological communities from this location; the majority of the 9 hectare portion of the study area within the Priority Conservation Lands (PCL) will be retained and conserved. The most recent records of Bush Rat (Rattus fuscipes), Swamp Rat (Rattus lutreolus) and Long-nosed Bandicoot (Perameles nasuta) in the study area on the NSW Wildlife Atlas (Bionet) date from 1991. There is also a more recent record for the Long-nosed Bandicoot from 2001 on the Holsworthy Defence lands to the south of the East Hills Railway line. None of the three species was recorded during the current survey; native rats have largely been displaced in urban areas by the European Black Rat (Stokes et al. 2009). The Cumberland Plain has been assessed as habitat for faunal species within the *Flora and Fauna Impact Assessment* . The *Flora and Fauna Impact Assessment* includes information on the Cumberland Plains Shale Woodlands and Shale-Gravel Transition Forest (Appendix 5 of the *Flora and Fauna Impact Assessment*). The Eastern Bent Wing bat is not likely to be significantly affected by the SIMTA proposal. It has been noted, however, that the foraging habitat for the Eastern bent wing bat will be disturbed and that seven hollow-bearing trees will be removed.	Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)
Biodiversity	Fauna endangered species	PS26	The koala is reported to be one of the biggest numbers in Southern Australia, and they would be threatened by the massive diesel emissions that would swamp their habitat which goes right down to Campbelltown.	It is considered unlikely that koalas would be present within the study area as the study area does not support the preferred habitat. While one preferred koala feed tree, Eucalyptus parramattensis (Parramatta Red Gum), was recorded in the bushland between the disused rail line and Moorebank Avenue, Koalas are not known to be associated with this vegetation type (Hard-leaved Scribbly Gum - Parramatta Red Gum heathy woodland of the Cumberland Plain, Sydney Basin) (OEH 2013). Larger expanses of habitat within the study area are isolated from habitat adjacent to the study area, due to the presence of significant barriers to fauna movement. A lack of habitat connectivity within the study area, and between the study area and adjacent areas, reduces potential movement of arboreal mammals such as Koalas into and through the study area.	Section 7.3.1 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)
Biodiversity	Impacts on flora and fauna	PS26	The 3 million containers to come to Moorebank will produce diesel emissions that Lichens in the air don't like.	Lichens are known to be useful environmental indicators for pollution monitoring. The potential for lichen monitoring in Australia has not been realised as there are so few lichenologists to carry out surveys (Environment Australia http://www.environment.gov.au/biodiversity/threatened/publications/action/cryptogams/7.html). The lichen assemblages of Sydney are not well documented and their conservation significance has not been assessed in detail. There is no publicly available and/or accessible information on the lichen assemblages in the locality of the study area and their sensitivity to pollution. There are no threatened species of lichen currently listed under the EPBC Act. Scott et al. (1997) provides a list of suggested endangered lichen species and their critical habitat, but none of these have subsequently been listed under the EPBC Act. None of the endangered species are in the western Sydney region. Only one lichen community is listed under the NSW Threatened Species Act 1995, the Mt Canobolas Xanthoparmelia Lichen Community, which is known only from Mt Canobolas. There are no threatened lichen species or communities known from the Sydney region.	Section 7.3.1 Section 7.3.2.3 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)
Biodiversity	Impacts on flora and fauna	PS16, PS4	Over development of the area, coupled with noise and light spill will have negative impacts on flora and fauna. The Proposal has a failure to consider altered vegetation composition and altered species composition (including loss of threatened flora) due to leachate from igneous base.	Impacts on habitat have been assessed in Section 3.3.2.1 of the *Flora and Fauna Impact Assessment* and Sections 7.3 of the EA, and the potential this will have to impact fauna species. No publicly available information could be found regarding the impacts of leachate from igneous base on vegetation composition. A database search found no published articles and internet searches did not produce any results.	Section 7.3 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)

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Biodiversity	Impacts on flora	PS26	Many trees have been affected by the relocation of the defence installations which are being moved to make way for the Moorebank Intermodals (for example in one case 80 trees - one of which was 300 years old - were destroyed in Moorebank avenue).	In 2009 the Australian Government released the 2009 Defence White Paper, 'Defending Australia in the Asia Pacific Century: Force 2030' which outline the Defence Logistics Transformation Program (DLTP). The purpose of the DLTP program is to rationalise and enhance the Defence national logistics network and deliver savings through consolidation of Defence infrastructure. The DLTP has been designed and planned independently of the SIMTA proposal. Decisions and actions taken by the Department of Defence as part of their relocation have not been made in conjunction with SIMTA. . The DLTP The purpose of the DLTP is to rationalise and enhance the Defence national logistics network and deliver savings through consolidation of Defence infrastructure. The website for the Moorebank component of the DLTP states: "In order for the DNSDC to more effectively and efficiently deliver support to the Australian Defence Force, there is a need to consolidate the existing warehousing and maintenance functions at Moorebank. This necessitates a significant investment in new facilities and infrastructure. It is not cost-effective for Defence to make a significant infrastructure investment on the leased site. Defence will redevelop the DNSDC on the Commonwealth-owned northern portion of the existing site, and the adjacent property known as West Wattle Grove to the east." Relocation of defence facilities on site would be likely to occur irrespective of the potential for the site to be used as an intermodal terminal.	N/A
Biodiversity	Flora identification	PS4	Failure to identify *Hibbertia* species on the site (refer p82 part 2), demonstrating a lack of expertise to identify threatened *Hibbertia* and other listed species.	Hibbertia sp. 'Bankstown' is currently known from only one population at Bankstown airport. The species has not been formally described or named. The site of the only known population of this species is on sandy Tertiary alluvium with high silt content; the soil type and assemblage of local native species are consistent with an inferred pre-settlement cover of Castlereagh Ironbark Forest. Although habitat requirements for Hibbertia sp. 'Bankstown' are not well defined, based on existing information the study area is considered unlikely to provide potential habitat for this species. The previously unidentified Hibbertia sp. recorded on the site was confirmed during recent surveys as Hibbertia riparian.	Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b).
Biodiversity	Flora endangered species	PS5	The proponent seeks to destroy a quantity of TSC and EPBC Act listed Grevillea parviflora and Persoonia nutans plant. An attempt at seed collection, propagation and planting as an exercise of plant translocation (as offered as compensation) is tokenism. The Precautionary Principle should instead have precedence, especially as both species are listed in Federal and State threatened species protection legislation and the Cumberland Plain Recovery Plan.	The impacts of the SIMTA proposal on the threatened plant species *Persoonia nutans* and *Grevillea parviflora subsp. parviflora* have been thoroughly assessed using the Assessment of Significance under the NSW EP&A Act and according to the EIS guidelines issued for the project under the EPBC Act. Seed collection, propagation and planting were included in the mitigation measures proposed for management of threatened species, but are not intended to form compensation for the impacts of the proposal on populations of these species; the *Preliminary Biodiversity Offset Strategy* outlines the options for offsetting biodiversity losses resulting from the proposal. It is acknowledged that *Persoonia nutans* and *Grevillea parviflora subsp. parviflora* are both listed under the TSC Act and EPBC Act, however neither of these species is addressed in the Cumberland Plain Recovery Plan; *Persoonia nutans* has its own specific recovery plan and although there is currently no recovery plan for *Grevillea parviflora subsp. parviflora* , specific environmental impact assessment guidelines and priority actions have been identified for this species. The ecological assessment has comprehensively considered the plans, guidelines, and actions prepared for these threatened species.	Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b) Appendix J2 *Preliminary Biodiversity Offset Strategy* (Hyder Consulting, June 2013c)
Biodiversity	Rail spur	PS5	A rail spur already exists off the East Hills Rail and through the Commonwealth land – this spur should be used instead and, if need be, create a route from the west which passes through the RIS identified exotic plants species after leaving the East Hills Rail Line. A points change could be constructed to link with the existing rail spur into the site. Despite there already being a rail spur off the East Hills Rail Line which features Castlereagh Scribbly Gum Woodland and Castlereagh Swamp Woodland, the proponent seeks to more than double the effect with an additional rail spur making two smaller remnants, each less able to survive edge effects.	Impacts on habitat have been assessed in Section 3.3.2.1 of the *Flora and Fauna Impact Assessment* and sections 7.3 of the EA, and the potential this will have to impact faunal species. The suitability of the rail spur has been addressed in a *Rail Access Report* , which has been prepared to assess the rail transport and access issues associated with the SIMTA proposal (Appendix Q). This report includes information on the proposed rail link and rail corridor. The new rail alignment will be designed in accordance with ARTC standards. The final rail alignment will be determined within the detailed design phase in future applications. The design has looked at a number of options and opportunities and consultation has been sought, with the relevant authorities and landowners, to achieve the best design outcome. Freight that arrives by rail will be transported to the warehouse and distribution facilities within the SIMTA site, or be directly loaded on to trucks for transport to warehouses and nearby logistics centre. Positioning of the rail spur on the SIMTA site also provides the greatest distance from the residences of Wattle Grove.	Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b) Appendix H *Rail Access Report - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
Biodiversity	Rail spur	PS5	Four TSC listed avifauna were identified foraging on site. Potential exists for the site to be inhabited by more TSC and EPBC species than indicated. Should such species (such as the Meridolum corneovirens - Cumberland Land Snail) exist on site an additional rail spur would seriously impact on present habitat and sustainability.	There are no records of the Cumberland Plain Land Snail in the study area in the NSW Wildlife Atlas. There are records for the species near the study area, as shown on Figure 11 of the *Flora and Fauna Assessment* (Appendix J1 of the EA). The closest record to the SIMTA site is dated from 2006 and located approximately 100 metres to the east of the DNSDC site in an area mapped as Shale Gravel Transition Forest (DECCW 2009). There are a number of additional records of this species dated from between 1999 and 2006 in Shale Gravel Transition Forest, Castlereagh Swamp Woodland and Castlereagh Scribbly Gum Woodland to the south of the East Hills Railway Line. Searches for the Cumberland Plain Land Snail were undertaken in areas of suitable habitat (leaf litter and beneath logs) during field assessment. The species was not identified in the study area.	Section 7.3.1 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)
Biodiversity	Rail spur	PS5	The construction phase of the additional rail spur (including trucks, carrying all manner of exotic seeds into the heart of the ecological communities) will add to the likely edge effects.	It is generally difficult to assess the quantitative impact of increased weed and pathogen incursion as a result of the proposed activities, particularly in urban bushland, such as that in the study area, that is already subject to degradation and considerable weed incursion. The approach taken in the *Flora and Fauna Assessment* was to assume that the proposal would result in increased potential for weed and pathogen incursion, and recommend mitigation measures to reduce these impacts. Mitigation measures, which are considered suitable to manage weed incursion are contained within Section 7.3.2.3 of the EA.	Section 7.3.1.2 Section 7.3.2.3 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
General	Powerhouse	PS7	The rail crossing of the River will ruin parklands and have a detrimental impact on the Powerhouse Arts Centre.	The *Noise Impact Assessment* includes information on rail noise on nearby sensitive receivers. Section 6.4 of the Report shows that rail noise levels from the SIMTA proposal are expected to be well below (>10bDA) the IGANRIP trigger levels. Regardless of the existing levels of rail traffic noise, the additional traffic noise from the SIMTA proposal will not exceed the trigger levels. Mitigation measures to minimise impacts on air quality from construction of the rail link and George River railway bridge are outlined in Section 5.1.2 of the *Air Quality Impact Assessment* (Appendix Q). Emissions from Rail Transport are assessed in Section 5.2.3 of the Report. The SIMTA proposal is not expected to have adverse impacts on any nearby parklands.	Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, 2013) Appendix Q *Air Quality Impact Assessment - Impact Assessment Report* (Pacific Environment, 2013)
Biodiversity	Offset measures	PS4	Failure to provide concrete offsets or even demonstrate that suitable offsets are available for the proposed actions.	A *Preliminary Biodiversity Offset Strategy* has been prepared and is addressed throughout the flora and fauna impact assessment. The recommendations of the *Preliminary Biodiversity Offset Strategy* are included in Section 7.3 of the EA. A copy of the strategy is included as Appendix J2. The Biodiversity Offset Strategy is currently be progressed including site identification with a plan to begin consultation with landowners in the near future. This information will be provided as it progresses.	Section 7.3 Appendix J2 *Preliminary Biodiversity Offset Strategy* (Hyder Consulting, June 2013c).
Biodiversity	Assessment period	PS5	The proponent has undertaken flora and fauna surveys in a narrow band of the late Autumn/mid Winter period. This will not produce an accurate assessment of species inhabiting and foraging the site. NSW Database records are an incomplete guide and ought not to be relied on. It is therefore difficult to determine the full extent of TSC and EPBC Act listed species affected.	The limitations of the flora and fauna surveys undertaken for the assessment are described in Section 2.4 of the *Flora and Fauna Assessment* . It is stated in this section that some local plant species are annuals and are present only in the seed bank for much of the year, and that others are perennial but are inconspicuous or difficult to identify unless flowering. These limitations were addressed by considering potential habitats for flora species and assessing the potential for targeted species to occur on the site based on previous records, the type and condition of habitats present, the land use throughout the study area and surrounds, and the landscape context.	Section 7.3.1 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b)
Biodiversity	Containers contamination	PS26	Contaminated containers could pose a great threat to a number of threatened and vulnerable species plants and fauna. It has been estimated that it would cost billions of dollars to properly sterilise the containers and this money would stretch government budgets and would place many important projects by the community at risk.	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 preliminary hazard assessment (PHA) will be undertaken for each stage of the development, as required by the State approval process and State Environmental Planning Policy 33. 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. Should unacceptable levels of risk be identified during the PHA, SIMTA will require tenants to demonstrate measures to reduce the risk to an acceptable level prior to the acceptance of tenancy. The assessment must also consider the risk and management of spills should they occur.	Section 8 Appendix L *Hazards and Risks Assessment – Impact Assessment Report* (Hyder Consulting, June 2013e).
Health Impacts	Traffic modelling and cumulative impacts	PS12, PS14	Cumulative impacts have not been adequately assessed, as studies are based on 1 million containers, whereas the capacity of the Moorebank intermodal is projected to be near 3 million containers. Therefore the health impact could be increased three fold, there could be 7000+ trucks tripling the level of diesel emissions and impacting on the local road network. The studies must be based on the worst case scenario, not the minimum.	The *Freight Demand Modelling* report and the *Transport and Accessibility Impact Assessment* report have been prepared based on a total freight catchment for intrastate freight, which would be shared between the two intermodal facilities (SIMTA and MICL IMTs), should both developments proceed. TfNSW's submission to the Concept Plan EA (CD 13/21056) notes that TfNSW is satisfied that SIMTA has adequately addressed the intermodal and capacity demands for the intermodal terminal, including the identification of the freight catchment area and freight catchment split. Section 3.3.2 of the EA includes a discussion of the relationship between the MICL proposal and the SIMTA proposal and notes that the intrastate freight catchment identified in the *Freight Demand Modelling* report would be shared between the two proposals. This report identifies the catchment demand for statistical local areas (SLA). The SIMTA proposal and the MICL proposal are located within the same SLA, hence the freight catchment would be shared between the two facilities (should both proceed). This is clearly stated in Section 3.3.2 of the EA: *The SIMTA proposal has been designed to service the freight catchment demand in its entirety, however, it is recognised that the SIMTA proposal may not be the sole facility provided within Moorebank. The Moorebank Intermodal Company Limited (MICL) is also pursuing the development of an intermodal terminal facility on the School of Military Engineering site on the opposite side of Moorebank Avenue. If this proposal is proceeded with, the catchment demand would remain unchanged, however, the anticipated freight needs would be shared between the two facilities.* The cumulative impact of the full SIMTA site operations or combined operations with the proposed Moorebank Intermodal Company Ltd (MICL) intermodal proposal has been assessed, taking into account the freight catchment demand of one million TEU. The locations of the sources of emissions would change if the demand was shared between the two sites, however, the overall scale of impact would be the same. A *Preliminary Screening Health Risk Assessment* has been prepared by Toxikos to assess the potential health impacts based on 1 million TEUs.	Appendix G *Freight Demand Modelling - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix W *Preliminary screening health risk assessment and literature review - Transitional Part 3A Concept Plan Application* (Toxikos, November 2012)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Cumulative impacts	PS15, PS26, PS5	Cumulative impacts from the recent completion of the Industrial Park at the corner of Moorebank avenue and Anzac Road and the intersection upgrade of Heathcote Road, Anzac and Nuwarra Road. These projects have resulted in articulated vehicles using residential streets. There will be cumulative impacts associated with noise, visual impact and air pollution (such as dust emissions from trucks driving on the dirt fringe of Anzac Road as it is not wide enough for heavy vehicles), and smell from diesel emissions. Cumulative impacts to assess the impacts from: the widening of the M5, the Liverpool turnback project, the south west rail link, many thousands of homes that will be built, and the expected 465,000 expected residents. The adjoining site to SIMTA's proposed site is the focus of a Commonwealth Government initiative also designed to relocate truck freight from Port Botany. The combination of two like proposals will just turn Moorebank and its streets into the very same environmental and traffic nightmare Port Botany has become. Thus just transferring the problem from one suburb to another.	Load limits and road treatments would be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs) are restricted under the Roads Transport (Mass Loading and Access) Regulation 2005 and the Road Transport (Vehicle Registration) Regulation 2007 from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Anzac Road is not mapped as a RAV route; therefore, trucks will not access the site via Anzac Road or other residential streets. The Environmental Assessment Report for the proposed M5 West Widening Project indicated that with proposed widening, the growth on M5 Motorway is forecast to increase between 2.5% and 3.1% per annum in the peak directions. The traffic growth predicted by the strategic model in the SIMTA project is in line with growth rates predicted in M5 West Widening project and these figures have been accepted by RMS. Section 5.3.1.2 of the EA discusses the regional and local areas and provides context to the projected regional growth. The local residential areas within proximity to the SIMTA site are identified in Section 2.2 and have been considered throughout the environmental assessment included in the report (Section 5-15). As outlined in the EA and the *Freight Demand Modelling Report,* the SIMTA proposal has been designed to service the entire port shuttle freight catchment, with a throughput capacity of one million TEU per annum by 2025. The traffic impact from SIMTA proposal has been assessed based on the forecast demand of one million TEU. Any further proposal by the Moorebank Intermodal Company Limited (MICL) is expected to service the same port shuttle freight catchment area, reducing the ability for SIMTA to achieve its' full operational capacity.	Section 5 Appendix G *Freight Demand Modelling - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).
General	Noise, visual impact and air pollution	PS18, PS19	Unless the SIMTA assessment was combined with the Federal Government proposed intermodal terminal, the impacts will not have been adequately assessed. Cumulative impacts on air quality, noise and traffic that would occur from both the SIMTA proposal an the MPO proposal should be assessed.	Cumulative impacts have been considered within specialist studies accordingly, including for Traffic and Access, Noise and Vibration, Air Quality, Rail Access and Freight Demand. As outlined in the EA and the *Freight Demand Modelling* report, the SIMTA proposal has been designed to service the entire port shuttle freight catchment, with a throughput capacity of one million TEU per annum by 2025. The traffic impact from SIMTA proposal has been assessed based on the forecast demand of one million TEU for port shuttle freight. The proposed Moorebank Intermodal Company Limited (MICL) intermoodal terminal is expected to service the same port shuttle freight catchment area, reducing the ability for SIMTA to achieve its' full operational capacity. The cumulative impact on air quality of the full SIMTA site operations or combined operations with the proposed MICL intermodal proposal has been assessed within the *Air Quality Impact Assessment* and section 11.3.3 of the EA. The locations of the sources of emissions would change if the demand was shared between the two sites, however, the overall scale of impact would be the same. Cumulative operational noise was assessed in Section 7 of the *Noise Impact Assessment* . Predicted noise levels from the MICL project are comparable to predicted noise levels from the SIMTA proposal. Accordingly, the method used to assess the noise impacts from the SIMTA proposal has been appropriated to split the 1 million TEU port shuttle freight catchment between the MICL and the SIMTA sites. Cumulative noise levels at sensitive receivers complies with the INP amenity criteria.	Sections 5.3.4, 6.3.2 and 11.3.3 Appendix Q *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013). Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix I *Noise Impact Assessment - Impact Assessment Report (* Wilkinson Murray, August 2013)
Traffic & Access	Traffic modelling-containers	PS7	If all containers are transported in by train at 50 containers per train then there will be a freight train every 25 minutes, plus the existing freight services, and will cause much distress to people living along the rail corridor.	Transporting freight by rail from Port Botany to the proposed intermodal facility at Moorebank will improve freight transport efficiency. One train can transport up to 91 TEU from Port Botany to the intermodal site, whereas one truck would likely only be able to transport on average, 2 TEU per trip (refer to Section 6.6.2 of *Transport and Accessibility Impact Assessment*). The SIMTA proposal is expected to generate 42 train movements per day at its peak (21 movements in each direction). The *Noise Impact Assessment* and *Air Quality Impact Assessment* both include an assessment of the likely impacts from the transportation of freight by rail. Section 6.4 of the *Noise Impact Assessment* shows that rail noise levels from the SIMTA proposal are expected to be well below (>10dBA) the IGANRIP trigger levels. Regardless of the existing levels of rail traffic noise, the additional traffic noise from the SIMTA proposal will not exceed the trigger levels. Section 8.2.2 of the *Air Quality Impact Assessment* found that there would be a reductions in emissions of NOx, PM10 and CO2 associate with the transfer of freight from road to rail.	Section 5.3.2.3 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix Q *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013). Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Traffic modelling- predicted population	PS24, PS25	The freight traffic from the Federal Government Intermodal needs to be considered in the traffic assessment. The assessment should consider the relocating of the equivalent of almost all of the current Port Botany's freight to Moorebank. The study does not appear to have included in its traffic estimates the future population, warehousing on site and over one thousand hectares of induced warehousing around the site.	Cumulative impacts have been considered in Section 6.9 of the *Transport and Accessibility Impact Assessment* and Section 5.3.4 of the EA. This is based on the information that is currently available from the MILC IMT site. The *Freight Demand Modelling* report and the *Transport and Accessibility Impact Assessment* report have been prepared based on a total freight catchment for intrastate freight, which would be shared between the two intermodal facilities (SIMTA and MICL IMTs), should both developments proceed. TfNSW's submission to the Concept Plan EA (CD 13/21056) notes that TfNSW is satisfied that SIMTA has adequately addressed the intermodal and capacity demands for the intermodal terminal, including the identification of the freight catchment area and freight catchment split. Section 3.3.2 of the EA includes a discussion of the relationship between the MICL proposal and the SIMTA proposal and notes that the intrastate freight catchment identified in the *Freight Demand Modelling* report would be shared between the two proposals. The *Transport and Accessibility Impact Assessment* assesses concerns over the adopted growth rate. The predicted population growth rate is acknowledged in Section 5.1 of the revised report. The strategic modelling undertaken predicted peak hour traffic growth in the core study area between 1.7% and 1.9% per annum until 2031.	Sections 3 and 5 Appendix G *Freight Demand Modelling - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).
Biodiversity	PCL	PS4	The impact on Priority Conservation Lands which would not be necessary if a more suitable site (such as that of the government proposal) were selected.	The native vegetation within the rail corridor lands to the south of the study area, an area of approximately 9 hectares, has been mapped as part of the Priority Conservation Lands (PCLs), as the north-western extent of a 2,314 hectare area extending across the Holsworthy Military Area. The area of the PCL within the study area represents 0.4% of the total area of the Holsworthy PCL and is located in the fragmented north-western corner of the PCL. This impact is considered minor, however mitigation measures have been included in the *Flora and Fauna Assessment* to further reduce this impact.	Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b).
Economic Analysis / Justification	Question of need	PS4, PS11, PS25, PS55	There is no need for a private intermodal (additional to a government proposal) The site selected is inappropriate for the proposed activity, and was selected purely on land cost. What economic, environmental and logistic benefit are there for Sydney from the SIMTA proposal? The intermodal will be new and purpose built and fully automated where possible. Therefore alternate uses of the site would create more jobs per square metre than an intermodal.	Sydney Ports has forecast that Port Botany is to reach the former planning capacity of 3.2 million TEU by 2017. To support this additional freight throughput, additional intermodal terminal capacity is required to service port freight by 2015. The SIMTA proposal can meet that timeline and increase the capacity required in the area. Section 3 of the EA details the need for the SIMTA proposal and outlines the justification for the proposal on a Commonwealth, State and Local level and Section 3.4 outlines the relationship with the proposed Commonwealth IMT for the adjoining site. The employment generating potential of the proposal has been assessed and it has been determined that the proposed intermodal facility will generate a significant number of direct and indirect jobs (refer to Section 15.3 of the *SIMTA Moorebank Intermodal Terminal Economic Assessment* - Appendix X). A total of 850 direct and indirect jobs per annum (over the six year construction period) will be generated and over 7,100 ongoing direct and indirect jobs will be generated once the intermodal facility is fully operational. This will have an important and considerable positive economic impact on the surrounding area.	Section 3 Appendix G *Freight demand Modelling – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)
Economic Analysis / Justification	Alternative location	PS12, PS14, PS20, PS23, PS25	Moorebank is not a suitable site as of the total containers landed at Port Botany only 13% are destined for South Western Sydney with 33% destined for Western Sydney, suggesting that Eastern Creek would be the most suitable location for the intermodal. Eastern Creek has already been recommended as a preferred site for an intermodal. Eastern Creek's closest residents are 1500 m away, compared with 500 m proximity of the nearest residents for the Moorebank Intermodal. The intermodal would be better placed in Western Sydney where there is plenty of open land and the majority of industry is already there.	The Moorebank precinct has been identified in both Federal and State strategies as the location for an intermodal terminal to service the industrial areas of West and South West Sydney which has the appropriate proximity to main arterial road networks and a dedicated freight line. The *Freight Demand Modelling* has been included in Appendix G of the EA and provides further explanation and detail on the extent and location of the freight catchment that would be serviced by the SIMTA proposal. The freight catchment to be serviced by SIMTA is different to the freight catchment that the proposed Eastern Creek IMT would service. The site is well-connected to major transport routes being 5km east of the M5/M7 Interchange; 2 km from the main north-south rail line and Southern Sydney Freight Line (SSFL); and 0.6km from the M5 Motorway. The proposed intermodal terminal and warehousing proposed on the SIMTA site are permitted under the Liverpool Local Environment Plan. The proposed link is permitted under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). The proposed development of the site to accommodate an intermodal terminal facility is considered compatible with the industrial zoning of the site and the industrial and defence zones applying to the surrounding land.	Section 3 Appendix G *Freight demand Modelling – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a)
Economic Analysis / Justification	Double handling	PS5, PS7, PS12, PS14, PS19, PS25	The proposal will result in the double handling of goods. Compounding logistic and economic negatives is a delay for the owner of the goods between arrival of goods in Australia and eventual delivery due to the increased number of steps involved in movement of goods. Very few trucks will actually need to come to Moorebank. Operators will be more likely to go straight from Port Botany to their destination unless forced to go to Moorebank first. In addition, Containers will arrive at Moorebank that require delivery to the east of the Moorebank facility (not just destined for the South and West of Moorebank).	As noted in the *SIMTA Moorebank Intermodal Terminal Economic Assessment,* the SIMTA proposal operations will involve freight being loaded onto trains at Port Botany, directly transporting containers to Moorebank on a dedicated freight line, unloading the containers at Moorebank into warehouses on site or onto trucks for delivery to businesses and warehouses across southwest Sydney. A *Freight Demand Modelling* has been included in Appendix G of the EA to further clarify the intended freight catchment of the SIMTA proposal and provide an explanation of the import/ export supply chain currently operating within the Sydney Metropolitan Area. It acknowledged in the study that: *for an intermodal terminal to be commercially viable it must be able to offer door to door delivery price inclusive of its bundled costs, that can compete with the cost of direct road delivery from the port. This bundle of costs include rail handling at port, rail transfer from port to intermodal terminal and delivery cost from intermodal terminal to delivery point, including container return intermodal terminal. Accordingly, the further the delivery point is away from the intermodal terminal, the less competitive it becomes against the cost of direct road delivery.* It is for this reason that IMTs within the Sydney region have defined freight catchments that they would service. The SIMTA proposal would service only those areas where the cost of delivery of freight via the intermodal can complete with the cost via road only.	Sections 3.3.2 and 5 Appendix F *Transport and Accessibility Impact Assessment -Part 3A Concept Plan Application* (Hyder Consulting, August 2013a) Appendix G *Freight Demand Modelling – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a) Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)
Economic Analysis / Justification	House prices	PS6, PS17, PS19, PS20, PS22	The proposal will have an impact on housing prices in the area. What compensation will be on offer for residents within the 2 km zone from the Intermodal.	Impact on value as a result of a project that does not result in any compulsory acquisition of land and does not result in a head of claim for compensation. The EA document sets out management and mitigation measures to preclude the proposal from having a significant impact on the amenity of the residential areas.	N/A

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
General	Proximity to residential area and general impacts	PS7, PS23	This type of development should not be near residential areas and environmentally sensitive areas, such as along the banks of the Georges River. In addition the site is too close to schools, preschools, parklands, homes and shops all of which would be adversely affected by increased traffic, noise and pollution.	Section 3.1 of the EA highlights the suitability of the proposed site for the intermodal terminal. Moorebank has been identified in State and Federal planning policy as a strategic location for an intermodal terminal to service the growing freight demands of South West Sydney. The proposed industrial uses across the SIMTA site are consistent with the industrial zoning of the site. The site is well-connected to major transport routes being 5km east of the M5/M7 Interchange; 2 km from the main north-south rail line and Southern Sydney Freight Line (SSFL); and 0.6km from the M5 Motorway. The intermodal terminal and warehousing proposed on the SIMTA site are permitted under the Liverpool Local Environment Plan. The proposed link is permitted under the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) and *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). The proposed development of the site to accommodate an intermodal terminal facility is considered compatible with the industrial zoning of the site and the industrial and defence zones applying to the surrounding land. Impacts have been considered within the EA and within specialist studies accordingly, including for Traffic and Access, Noise and Vibration, Air Quality, Rail Access and Freight Demand.	Section 3.1, Sections 5-15
Economic Analysis / Justification	Economic base case	PS24	The economic base case (where all containers are trucked to Moorebank, and then distributed) is an oversimplification of reality. Firstly because one of the major destinations for the containers is the Holsworthy Army base, which Is only a few hundred metres down the road. A second major destination is the Bankstown Industrial Area. Trucks would have to pay a toll to reach Moorebank, then another to backtrack to Bankstown, which they would not be able to do. Based on the above, the 'base' case is not reasonable, making the economic justification in the 'improved case' (where all containers are railed to Moorebank) misleading.	As noted in the *SIMTA Moorebank Intermodal Terminal Economic Assessment* , the SIMTA proposal operations will involve freight being loaded onto trains at Port Botany, directly transporting containers to Moorebank on a dedicated freight line, and the unloading the containers at Moorebank into warehouses on site or onto trucks for delivery to businesses and warehouses within the freight catchment identified in the *Freight Demand Modelling* report, included as Appendix G to the EA.	Section 3.3.2 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a) Appendix G *Freight Demand Modelling - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a)
Economic Analysis / Justification	Data requirements	PS25	All calculations used to achieve economic estimates should be provided. Information within the economic analysis is blacked out (such as infrastructure issues). It is impossible to read the report.	Economic impacts and estimates have been included within the *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Appendix X) as an Appendix to the EA. Please refer to this report rather than the report prepared for the Department of Finance and Deregulation (2012) regarding the MICL Intermodal Terminal. Economic calculations and assumptions are included within the report. Section 1.2 of the report outlines Sydney's Existing Freight infrastructure and impacts of the SIMTA proposal on Freight Infrastructure are outlined throughout the report. Section 15.3 of the EA outlines the key findings of the economic assessment and summarise the economic impacts associated with the SIMTA proposal.	Section 15.3 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)
Economic Analysis / Justification	Project and other costs	PS26, PS25	The cost of constructing the 2 intermodals would have to be in the area of 15-25 billion dollars. Since the project has been quoted as being 1 billion dollars, it is likely that the federal and state government provide much of the infrastructure. Who pays for the negative impacts of the Proposal. Negative Impacts include: Moving the Army ($900 million), remediation of the land ($100-200 mill, infrastructure upgrades, building the rail spur ($500 million), increased accidents, increased travel delay, inaccessibility to Liverpool CBD (loss of business), inaccessibility to hospital and schools, increased health care due to increased cancers from pollution, and environmental costs.	The proponent will bear the cost associated with the construction and operation of the SIMTA intermodal terminal. As discussed in Section 1.3 of the report the capital investment of the proposal has been estimated (by a Quantity Surveyors Certificate) to be $490million. Section 8 of the *Transport and Accessibility Impact Assessment* report outlines the proposed infrastructure upgrades necessary to deliver adequate capacity for the road network. Road network upgrades would be discussed and negotiated with RMS, and potentially impacted stakeholders. Funding arrangement will be determined in the subsequent stages of planning approval. Potential negative impacts have been considered within the EA and within specialist studies accordingly, including for Traffic and Access, Noise and Vibration, Air Quality, Rail Access and Freight Demand. In 2009 the Australian Government released the 2009 Defence White Paper, 'Defending Australia in the Asia Pacific Century: Force 2030' which outline the Defence Logistics Transformation Program (DLTP). The purpose of the DLTP program is to rationalise and enhance the Defence national logistics network and deliver savings through consolidation of Defence infrastructure. The website for the Moorebank component of the DLTP states: *In order for the DNSDC to more effectively and efficiently deliver support to the Australian Defence Force, there is a need to consolidate the existing warehousing and maintenance functions at Moorebank. This necessitates a significant investment in new facilities and infrastructure.* *It is not cost-effective for Defence to make a significant infrastructure investment on the leased site. Defence will redevelop the DNSDC on the Commonwealth-owned northern portion of the existing site, and the adjacent property known as West Wattle Grove to the east.* As parliamentary approval has been granted for the DLTP program and works have commenced on the relocated DNSDC site, which are scheduled for completion in mid-2014, it is contradictory to the aims of the DLTP program for Defence to continue paying for the lease over the SIMTA site once the works for relocation are complete. Defence relocation is, therefore, a more efficient outcome. The *Transport and Accessibility Impact Assessment* outlines the potential changes in travel delay times. Section 6.12 of this report assesses the potential impact on crashes/accidents, and concludes that the SIMTA proposal would not substantially increase the likelihood of crashes/accidents in the longer term. Health impacts have been assessed with the *Preliminary Screening Health Risk Assessment* and Section 15.2 of the EA. No significant health risks have been identified as a result of the SIMTA proposal. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards.	Appendix F *Transport and Accessibility Impact Assessment -Part 3A Concept Plan Application* (Hyder Consulting, August 2013a) Appendix Q *Air Quality Impact Assessment - Transitional Part 3A Concept Plan Application* (Pacific Environment, June 2013). Appendix L *Hazards and Risks Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013e) Appendix W *Preliminary Screening Health Risk Assessment and Literature Review* (Toxikos, November 2012). Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
Economic Analysis / Justification	Project benefits	PS25	The overall Project Benefits will be $2.3 billion in present value terms, not the $10 billion stated.	These figures do not refer to the SIMTA proposal. The economic impacts from the proposal have been outlined in the *SIMTA Moorebank Intermodal Terminal Economic Assessment* as an appendix to the EA.	Section 15.3 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
General	Diverse impacts	PS14	The proposal will lead to traffic gridlock, noise pollution and light spill, ground vibration, ground waterway pollution, decline in natural flora and fauna in the land area.	Impacts have been considered within the EA and within specialist studies accordingly, including for Traffic and Access, Noise and Vibration, Air Quality, Rail Access and Freight Demand. Section 5.3 of the EA discusses the traffic impacts of the SIMTA proposal and identifies the strategies to mitigate traffic impacts on the surrounding road network. The *Transport and Accessibility Impact Assessment* provides information on the proposed upgrades to the surrounding road network, which are discussed in detail in Section 8.1 of Appendix F to the EA. Noise impacts have been assessed for the SIMTA terminal operating at 250,000 TEU throughput and 1 million TEU throughput and both these assessment reports are provided in Appendix I to the EA, with the outcomes and mitigation measures summarised in Sections 6.3 of the EA. Light spill has been assessed in the *Visual Impact Assessment* and has been summarised in Section 13.3 of the EA. The light spill assessment has demonstrated that the lighting can be designed to meet the relevant criteria and avoid detrimental impacts on the surrounding area, with opportunities to further reduce the maximum height and associated potential impacts in the detailed design phase. Vibration has been assessed in section 5.6 of the *Noise Impact Assessment* . Section 6.3.1.2 of the EA concludes that there are no human comfort or building damage impacts likely to occur as a result of construction vibration. The proposal is considered unlikely to result in impacts on groundwater quality or quantity. Impacts on Biodiversity have been assessed in Section 7.3 of the EA and the *Flora and Fauna Impact Assessment* . Mitigation measures have been outlines in section 5 of this report.	Sections 5.3, 6.3, 7.3 and 13.3 Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013) Appendix U *Visual Impact Assessment - Transitional Part 3A Concept Application* (Reid Campbell, June 2013b) Appendix F *Transport and Accessibility Impact Assessment - Part 3A Concept Plan Application* (Hyder Consulting, August 2013a) Appendix JI *Flora and Fauna Assessment - Impact Assessment Report* (Hyder Consulting, August 2013b)
General	Casula Powerhouse	PS16	The project will have an impact on the Casula Powerhouse. This has not been properly assessed.	The *Noise Impact Assessment r* eport assesses impacts on the Casula Powerhouse. The predicted operational noise (including noise from trucks and trains operating on the site and within those sections of the rail link that are on privately owned land) levels for this receiver are not expected to exceed the assessment criteria in either calm or adverse meteorological conditions. In addition the cumulative noise levels were assessed for the MICL proposal as well as the SIMTA proposal and similarly found that the noise level criteria will not be exceeded. The Casula Powerhouse is located to the west of the SIMTA site and to the South-east of the R3 residential receiver assessed within the *Noise Impact Assessment.* The Rail Noise assessment (Section 6.4) for R3 found that the trigger level was not exceeded. As the trigger level is more stringent for residential receivers than for non-residential receivers, it is unlikely that rail noise will adversely affect the Casula Powerhouse. The EA found that there would be no impacts to the heritage significance of this item.	Section 6.3.1 Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
General	Community consultation	PS26	Community meetings have been held in isolated meeting areas, which have made their attendance unlikely. Many residents are unaware of the rail issues and community forums have not been done.	SIMTA has, and will continue to undertake an extensive consultation program for this proposal. The consultation program has exceeded requirements and adopted best practice community engagement timeframes by commencing consultation activities a year before the lodgement of a Preliminary Environmental Assessment (PEA) under the State assessment process and two years prior to referral under the EPBC Act. The Community Information Centre (CIC) was established to engage with the community and provide a place where people could come and view information, ask questions and provide feedback on the proposal. In addition to the CIC, SIMTA have engaged with stakeholders through one-on-one meetings and have provided feedback channels through an email address and an information line. Demographic profile for the local and regional contexts of the SIMTA proposal is detailed in Section 3 of Appendix CC of the EA, the *Social Impact Commentary Report* , including information on the cultural and linguistic characteristics of the area (Section 3.2.3). Non-English speaking background visitors from linguistically diverse backgrounds were advised that interpreter services were available and arrangements could be made on request. Section 17.3 of the EA outlines the methods of community consultation that were undertaken. In addition Aboriginal consultation was undertaken with registered parties as outlined in the *Aboriginal Cultural Heritage Assessment* (Appendix S of the EA). Section 17.3 of the EA also summarises the issues raised by the community through the CIC and in response to the letterbox drops and the answers provided by the SIMTA project team and how these issues have been addressed.	Section 17.3 *Appendix CC Social Impact Commentary - Transitional Part 3A Concept Plan Application* (Urbis, June 2013b) Appendix S *Aboriginal Cultural Heritage Assessment - Part 3A Concept Application* (AHMS, 2012)
Greenhouse Gas	GHG emissions	PS12	The proponent will not reduce the amount of road traffic within the local Moorebank area and surrounding region, and the efficiency of rail is yet to be seen. Therefore the assertion that the proposal will reduce end emissions by 40,820 t CO2e is questionable.	By transporting freight by rail from Port Botany to the proposed Moorebank Intermodal facility the proposal will reduce the number of trucks on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site , whereas one truck would likely only be able to transport on average, 2 TEU per trip (refer to Section 6.6.2 of *Transport and Accessibility Impact Assessment*). The *Greenhouse Gas Assessment* notes that the traffic projections suggest that freight road transport from Port Botany will be reduced by approximately 13 million vehicle kilometres per annum regionally by the time the facility is fully operational. The resulting increase in rail transport as a result of the facility is projected to be approximately 332,000 KVT. 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.*	Appendix F *Transport and Accessibility Impact Assessment - Part 3A Concept Plan Application* (Hyder Consulting, August 2013a) Appendix R *Greenhouse Gas Assessment - Transitional Part 3A Concept Plan Application (* Hyder Consulting, June 2013h).
Hazards and Risks	Hazard and risk identification	PS14	Hazards and Risks should be identified and made public. There is no point looking at these problems after the project has been approved.	Section 8.5 (and Appendix L)of the report identifies the potential on-site and off-site hazards and risk associated with the SIMTA proposal, based on the information available at this stage (Concept Plan). A preliminary hazard assessment (PHA) will be undertaken for each stage of the development, as required by the State approval process and State Environmental Planning Policy 33. 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. Should unacceptable levels of risk be identified during the PHA, SIMTA will require tenants to demonstrate measures to reduce the risk to an acceptable level prior to the acceptance of tenancy. The assessment must also consider the risk and management of spills should they occur.	Section 8 Appendix L *Hazards and Risks Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013e)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Hazards and Risks	Hazard and risk management	PS19	There is potential for an accident with unknown container contents spillage or leaking into the George's River, local water tables, soil or air. There is potential for an explosion to result from an accident or careless handling, which may result in damage to resident's homes and other surrounding infrastructure.	Section 8.5 (and Appendix L)of the report identifies the potential on-site and off-site hazards and risk associated with the SIMTA proposal, based on the information available at this stage (Concept Plan). It is noted that 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 preliminary hazard assessment (PHA) will be undertaken for each stage of the development, as required by the State approval process and State Environmental Planning Policy 33. 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. Should unacceptable levels of risk be identified during the PHA, SIMTA will require tenants to demonstrate measures to reduce the risk to an acceptable level prior to the acceptance of tenancy. The assessment must also consider the risk and management of spills should they occur.	Section 8 Appendix L *Hazards and Risks Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013e)
Hazards and Risks	Hazard and risk management	PS26	There may be unexploded devices in the Holsworthy army reserve.	The Proponent will undertake a detailed contamination assessment prior to commencement of construction on the proposed site. As noted within the Statement of Commitments in Section 18 of the EA, the proponent will undertake a Phase 2 intrusive environmental site assessment, and states in regards to Unexploded Ordinances Section 18, that: *The Proponent commits to undertaking any remediation (where necessary) prior to the commencement of construction.*	Section 18
Health Impacts	Air pollution and cumulative impacts	PS9, PS19, PS23	The air quality here is already bad with many children and adults suffering from asthma and the increase in pollution from the diesel emissions will further exacerbate the problem.	Health impacts of the SIMTA proposal, including those associated with diesel emissions, have been assessed within a *Preliminary Screening Health Risk Assessment* (Appendix W) and are discussed in Section 15.2 of the EA. Measures to mitigate impacts on air quality that would be adopted for the SIMTA proposal are outlined in Section 11.3. The assessment undertaken for the EA, including an *Air Quality Impact Assessment* , has indicated low health risk associated with the proposal. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards. Additional impact assessments will be undertaken for the detailed applications associated with the future stages.	Sections 11.3 and 15.2 Appendix W *Preliminary Screening Health Risk Assessment and Literature Review – Transitional Part 3A Concept Plan Application* (Toxikos, November 2012). Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013) Appendix Q *Air Quality Impact Assessment - Impact Assessment Report* (Pacific Environment, 2013)
Health Impacts	Air pollution impacts and health costs	PS12, PS20, PS14, PS16, PS17, PS19, PS23, PS25, PS26	Air pollution can lead to the following health impacts: shortened life expectancy, asthma symptoms, babies are more likely to be premature of have low birth weight, respiratory symptoms in two year olds, and children are more likely to develop cancer and have impacts on their lungs (which have not been adequately assessed). The annual health cost associated with current levels of air pollution in the Greater Metropolitan Region is $4.7 billion ($893 per head) and air pollution causes between 640 and 1400 deaths per year in Sydney, between 359 and 784 hospital admissions from respiratory conditions and between 561 and 1206 hospital admissions from cardiovascular conditions. These problems will be worsened by the Proposal. In addition, this will put pressure on local hospitals, which may not have the capacity to care for the health impacts. The huge increase in pollution coupled with sleep deprivation from pollution, noise, vibrations and light spill will compromise people's health.	Health impacts of the SIMTA proposal, including those associated with diesel emissions, have been assessed within a *Preliminary Screening Health Risk Assessment* (Appendix W) and are discussed in Section 15.2 of the EA. Measures to mitigate impacts on air quality that would be adopted for the SIMTA proposal are outlined in Section 11.3. The assessment undertaken for the EA, including air quality impact assessment and noise impact assessment, has indicated low health risks associated with the proposal. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards. Additional impact assessments will be undertaken for the detailed applications associated with the future stages. The *Air Quality Impact Assessment* includes information on local and regional air pollution. Monitoring of air quality is outlined in Section 9 of the Report.	Sections 11.3 and 15.2 Appendix W *Preliminary Screening Health Risk Assessment and Literature Review – Transitional Part 3A Concept Plan Application* (Toxikos, November 2012). Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013) Appendix Q *Air Quality Impact Assessment - Impact Assessment Report* (Pacific Environment, 2013)
Health Impacts	Cancer concerns and health costs	PS10, PS14, PS19, PS25	There is a cancer concern to residents as there will be an increased amount of diesel trucks to the intermodal. Diesel emissions are 1000 times more carcinogenic than petrol emissions. The DGRs only specify that PM10 (not PM2.5 which causes cancer) is required to be studied. The annual health cost of 2001-2002 of ambient pollution levels was $1,594 per capita. Who will pay for cancer patients. It is a known fact published by the World Health Organisation that diesel particulates are carcinogenic. Beyond cancer, known health effects include coughing or difficult breathing, chronic bronchitis, and premature death in people with heart or lung disease.	Health impacts of the SIMTA proposal, including those associated with diesel emissions, have been assessed within a *Preliminary Screening Health Risk Assessment* (Appendix W) and are discussed in Section 15.2 of the EA. Measures to mitigate impacts on air quality that would be adopted for the SIMTA proposal are outlined in Section 11.3. Health impacts associated with PM2.5 have been assessed within the *Preliminary Screening Health Risk Assessment* . Section 6.1 of this report notes that: *For assessing health effects from particulate matter the PM2.5 fraction was selected ahead of PM10 as the representative fraction as PM2.5 has been more closely related to hospital admissions and mortality.* It is further noted in Section 6.2.4 of the report that: *Adverse health impacts due to PM2.5 are primarily related to sharp short term increases in daily average PM2.5 concentrations. The proposed IMT does not contribute to such a change in daily average PM2.5 concentrations.*	Sections 11.3 and 15.2 Appendix W *Preliminary Screening Health Risk Assessment and Literature Review – Transitional Part 3A Concept Plan Application* (Toxikos, November 2012). Appendix Q *Air Quality Impact Assessment - Impact Assessment Report* (Pacific Environment, 2013)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Health Impacts	Proximity to residential area	PS8, P15, PS14	The project is too big for a residential area. People's health will suffer with extra pollution and noise. The lack of detail for solutions mitigating the long term issues placing an intermodal next to a residential area are insufficient and do not guarantee a satisfactory quality standard of living for residents. The closest residents are 250m from the site, not the 400m stated by the proponent.	Section 3.1 of the EA highlights the suitability of the proposed site for the Moorebank Intermodal Transfer Station. Moorebank has been identified in State and Federal planning policy as a strategic location for an intermodal terminal to service the growing freight demands of South West Sydney. The proposed industrial uses across the SIMTA site are consistent with the industrial zoning of the site. Health impacts of the SIMTA proposal have been assessed within a *Preliminary Screening Health Risk Assessment* (Appendix W) and are discussed in Section 15.2 of the EA. The assessment undertaken for the EA, including *Air Quality Impact Assessment* and *Noise Impact Assessment* , has indicated low health risks associated with the proposal. Changes in air quality as a result of the proposal determine the risk of adverse effects on human health, as assessed by comparison with health-based air quality criteria. The proposal has a low risk by these standards. Additional impact assessments will be undertaken for the detailed applications associated with the future stages. Management and mitigation measures are outlined through the EA and are summarised in Section 16. The nearest resident is located in Wattle Grove, approximately 400m to the south east of the site.	Sections 3.1 and 16 Appendix W *Preliminary Screening Health Risk Assessment and Literature Review – Transitional Part 3A Concept Plan Application* (Toxikos, November 2012). Appendix Q *Air Quality Impact Assessment - Impact Assessment Report* (Pacific Environment, 2013) Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
Hydrology	Flooding	PS19	Flooding of the Georges River is of great concern. Newbridge rd near Flower Power has flooded numerous times and heavy rain in a short period can cause flooding along Newbridge Rd which has the Georges River at 2 points near the area. The effects of heavy rain could make it difficult to operate a freight hub.	Mapping of the extent of flood impacts to the south of the SIMTA site is provided in the *Flood Study and Stormwater Management* . 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 onsite detention and stormwater conveyance measures to minimise flood impacts as a result of the SIMTA proposal. Section 6.1 of the *Flood Study and Stormwater Management* report discusses the predicted flooding impacts associated with the proposed Georges River bridge. The modelling concluded that the proposed bridge would result in a 10 mm increase 1 km upstream and a 30 mm increase downstream during the 100 year ARI event. These changes are representative of the changes associated with the existing East Hills Railway bridge. The report concluded that the impacts of the proposal on flooding of the Georges River could be minimised through the adoption of the design principles presented in the report.	Appendix P -*Flood Study and Stormwater Management - Transitional Part 3A Concept Plan Application* (Hyder, June 2013g).
Hydrology	Water pollution	PS14, PS16	The close proximity of the Georges River and Anzac Creek will lead to pollution of both waterways.	Aquatic fauna surveys identified a low diversity of macroinvertebrates and one native and one exotic fish species from sampling sites in the Georges River and Anzac Creek. Aquatic habitats in both the Georges River and Anzac Creek are considered to be poor quality with dense infestations of weeds reducing habitat by smothering native vegetation. Mitigation measures currently proposed to minimise impacts of construction in riparian areas/in proximity to watercourses include installation of appropriate drainage controls and design of rail crossings in accordance with fish passage guidelines. The Framework Soil and Water Management Plan sets out how impacts on soil and water would be managed through the construction phase of the proposal while Section 7.3.2.3 of the EA prescribes measures that would be implemented to mitigate impacts throughout construction and operation.	Section 7.3.1 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting, August 2013b).
Noise & Vibration	Operational noise	PS6, PS14, PS 12, PS15	Operational noise will have a negative impact on the community and surrounding areas. There is currently low noise levels in surrounding suburbs (such as Wattle Grove), which should not be changed. It is unacceptable to operate the rail and container handling process's with virtually no noise protection for the residents of west Wattle Grove. The staging process shows that stage 1 is scheduled for completion mid 2015 with little in the way of warehousing (which are to act a noise mitigation for the western side of Wattle Grove). The next stage is not due for completion till mid 2019 resulting in the residents of West Wattle Grove being exposed to nuisance noise for a period of 4 years minimum. Warehousing in stage 2 is subject to market demand. This would suggest the warehouses that were intended to act as a buffer zone may not be built until 2022 if at all. Sounds barriers need to also be installed on the East side of Moorebank Avenue from the SIMTA site entrance to the M5 Motorway.	Section 5.7 of the *Noise Impact Assessment* addresses the potential effects of noise on health. It is documented that the noise criteria are established to ensure negative health impacts from noise do not occur. Predicted operational noise levels are all within the established criteria for nearby receivers (with the exception of receiver R3), including sleep disturbance criteria, and therefore adverse health impacts are not expected to occur. Mitigation measures to reduce the impact of noise on nearby residents are listed in Section 6.3 of the EA, including recommendation that provision be made to allow for the future development of a noise barrier that runs parallel with the western boundary of the site. Noise impacts have been assessed for the SIMTA terminal operating during a 'worst case 15 minute scenario' at 1 million TEU throughput and this assessment reports is provided in Appendix I to the EA, with the outcomes summarised in Section 6.3.1.2 of the EA. Recommendations have been made within the *Noise Impact Assessment* for the location of buildings so that they may act as acoustic shields for sensitive receiver and specifies that buildings nearest residents are for less noise-intensive activities. As noted above, SIMTA would make provision for a noise barrier along the western boundary of the SIMTA site, the requirement for which would be determined during subsequent stages of planning approval.	Sections 6.3 and 6.3.1.2 *Appendix I, Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, 2013)
Noise & Vibration	Sleep disturbance	PS9, PS22, PS23, PS10	Noise generated at night will carry greater distances and impact greatly on the surrounding suburbs. Noise pollution will increase as the intermodal will no doubt be open beyond normal business hours. It is of concern that site maintenance activities will be carried out between 3.00am and 5.00am as this form of maintenance can be extremely noisy.	The *Noise Impact Assessment* , prepared by Wilkinson Murray (2013), provides detail on the potential noise and vibration impacts associated with the SIMTA proposal. The report contains figures that show the night time modelled operational noise contours. Section 6.2 of the report assesses the potential for sleep disturbance and concludes that predicted noise levels at all receivers are less than the sleep disturbance screening levels. The *Noise Impact Assessment* contains figures that show the day time and the night time modelled operational noise contours, which clearly show the predicted noise impacts from the proposal on the relocated DNSDC site and the SME /MICL site. All maintenance activities carried out on site would have to comply with operational noise limits and are not expected to exceed INP trigger levels.	Section 6.3 *Appendix I, Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Noise & Vibration	Sleep disturbance and cumulative impacts	PS14, PS15, PS20, PS21, PS19, PS22, PS21	People and houses along the Southern Sydney Freight line are already suffering sleep deprivation and damage to their houses through vibration from the freight line and the current freight traffic they already experience. The SIMTA construction has been noted as extending over a period of 12 years and some of the equipment used will bring noise levels of 122 dba. Also it is noted that they say that freight trains will bring sound levels of 41-45 decibels along Casula Liverpool when residents have been complaining about excessive noise levels up to 97 decibels. Noise levels associated with an additional 1 million TEUs being transported will be unbearable in the Glen Regent Estate.	The *Noise Impact assessment* includes information on the potential noise impact for nearby sensitive receivers and includes predicted levels of operational, road traffic and rail traffic noise. Noise impacts associated with train freight on the SSFL have been assessed as part of the planning approval process for the SSFL. A comprehensive assessment of the potential noise and vibration impacts of the SIMTA proposal is detailed in Section 6 of the *Noise Impact Assessment* and Section 6.3 of the updated EA. The operational noise criteria established using the 'intrusiveness' and 'amenity' criteria in the *NSW Industrial Noise Policy* (INP). The rail traffic noise criteria were established using the EPA's *Interim Guideline for the Assessment of Noise from Rail Infrastructure Projects* and the *Rail Infrastructure Noise Guideline* . The revised *Noise Impact Assessment* adopted a conservative approach to the assessment of rail noise impacts whereby the worst case 15 minute noise levels are compared to the most stringent criteria. This involved predicting noise levels for the SIMTA facility when operating at its peak throughput, and comparing these levels to the intrusive criterion during the night time. Section 6.2 of this report assessed the transient noise events associated with the SIMTA proposal and found that the predicted noise levels at all receivers are less than the sleep disturbance screening levels. Predicted Construction Noise Levels at sensitive receivers are outlined in Section 6.5 of the report. It is noted that sensitive receiver R3 may experience an exceedance in construction noise levels of up to 9dBA as a result of constructing rail sidings. Monitoring recommendations for construction noise and vibration are outlined in Section 8.1 of the report. Section 6.3 of the EA outlines management and mitigation measures. Section 6.1.3 of the *Noise Impact Assessment* outlines Mitigation options for noise levels at R3, including recommendation that provisions be made which allow for the future development of a noise barrier that runs close to and parallels with the western boundary of the proposed SIMTA site. The *Noise Impact Assessment* found that predicted levels of operational, road traffic and rail traffic noise are all within the established criteria for nearby receivers. Noise impacts associated with the operation of the SSFL have been assessed as part of the development approval process for the SSFL. As noted in the Rail Access Report, there are sufficient rail paths available to support the SIMTA development within the approved operating capacity of the SSFL.	Section 6.3 Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise & Vibration	Housing materials of the area	PS12	Homes in the area are of a simple brick construction and many are within 400 metres of the proposed site. There is no way that train horns, shunting operations, tonal reversing alarms and containers banging each other won't cause sleep disturbance (as stated in section 6.3.1.2).	A revised *Noise Impact Assessment* report was prepared by Wilkinson Murray (2013) to provide further detail on the potential noise and vibration impacts associated with the SIMTA proposal. The revised report includes additional information on the potential impact from noise and vibration on nearby sensitive receivers (both residential and non-residential). Rail vibration associated with the SSFL has been assessed as part of the SSFL noise assessment. Rail vibration associated with the rail spur is expected to be well within building damage vibration criteria as identified in the *Noise Impact Assessment* . Vibration from road traffic would not be expected to be excessive at the typical building offset to the concept stage route. Section 6.2 of the revised report assesses the potential for sleep disturbance and concludes that predicted noise levels at all receivers are less than the sleep disturbance screening levels. SIMTA would make provision for a noise barrier along the western boundary of the SIMTA site. The need for a barrier would be confirmed during the detailed assessments at subsequent stages of planning approval.	Section 6 Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise & Vibration	Noise assessment location	PS15	The location of Noise and Vibration studies conducted in residential areas do not represent actual noise levels of a majority of residents that will be subjects to noise from the SIMTA site. Namely, 6 Namoi Court Wattle Grove is not representative of an address likely to be impacted by noise as it is six houses from the fence line, is on flat land and is sheltered by large brick veneer. A study needs to be re-taken from a property located on the Anzac Road fence line.	The *Noise Impact Assessment* report (Section 3) identifies 4 residential and 3 non-residential sensitive receivers, 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. The receivers selected are representative of the area and are considered suitable for the purposes of this assessment due to their proximity to the site. Sensitive receivers are representative of the catchments within close proximity to the proposed site.	Section 6.3 Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise & Vibration	Structural damage	PS16	The noise and vibration impacts this project will have on the area have not been properly assessed. For example, will it cause structural damage to properties and local infrastructure, and who will fund mitigation strategies.	A comprehensive assessment of the potential noise and vibration impacts of the SIMTA proposal is detailed in Section 6 of the *Noise Impact Assessment* and Section 6.3 of the EA. Section 6.6 of the *Noise Impact Assessment* assessed construction vibration impacts associated with the SIMTA proposal. No human comfort impacts are expected to occur as there are no vibration sensitive receivers within several hundred metres of the site. Vibration levels which are likely to result in building damage are greater than those that impact on human comfort. Accordingly, building damage due to vibration is not expected to occur at residential receivers. Section 6.3 of the EA outlines management and mitigation measures for noise and vibration associated with the construction and operations of the proposal.	Sections 6.3 and 6.3.1 Appendix I *Noise Impact Assessment - Impact Assessment Report* (Wilkinson Murray, August 2013)
Noise & Vibration	Truck and Train noise	PS26	Despite noise barriers, background traffic can still be heard. Trucks and heavy vehicles will generate noise when they accelerate from a standing start. They use compression braking causing noise and vibration. Noise levels in the order of 100 decibels produced by train movements every 20 minutes will affect over a million residents. In addition 1.2 million residents who live on the banks of the Georges River can not possibly survive the rail spurs running over the Georges River.	When operating at full capacity the SIMTA proposal would utilise 42 train movements between Port Botany and the SIMTA site, using the SSFL. Noise impacts associated with trains on the SSFL have been assessed as part of the planning approval process for the SSFL. A comprehensive assessment of the potential noise and vibration impacts of the SIMTA proposal is detailed in Section 6 of the *Noise Impact Assessment* and Section 6.3.1 of the EA. The operational noise criteria established using the 'intrusiveness' and 'amenity' criteria in the NSW Industrial Noise Policy. The rail traffic noise criteria were established using the EPA's *Interim Guideline for the Assessment of Noise from Rail Infrastructure Projects* and the *Rail Infrastructure Noise Guideline.* Section 6.3 of the EA discusses the noise impacts of the SIMTA proposal as well as strategies to mitigate noise impacts resulting from the SIMTA proposal. The *Noise Impact Assessment* adopted a conservative approach to the assessment of rail noise impacts whereby the worst case 15 minute noise levels are compared to the most stringent criteria. This involved predicting noise levels for the SIMTA facility when operating at its peak throughput, and comparing these levels to the intrusive criterion during the night time. The EA has been reflects the findings in the *Noise Impact Assessment* . The *Noise Impact Assessment* found that predicted levels of operational, road traffic and rail traffic noise are all within the established criteria for nearby receivers.	Section 6 Appendix I *Noise Impact Assessment – Impact Assessment Report* (Wilkinson Murray, August 2013)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Noise & Vibration	Alternative for the construction of a noise wall	PS5	The existing rail spur should be used. Site layout and potential exposure of Wattle Grove residents to operational noise through use of the existing spur are not appropriate excuses not to use the existing rail spur. This is evident by the fact that the Defence Force deemed it effective for the spur to access the central point on the site, buildings were located on either side of the centre of the site, the shortest distance from the rail spur to warehouses should be used, Wattle Grove residents are accustomed to the central location of the rail spur being used as a continuation of goods transfer at the centre of the site, buildings constructed to the east of centre will serve as a noise buffer, and a noise wall could potentially be constructed within the eastern boundary of the site as added noise abatement for residents of Wattle Grove.	A *Rail Access Report* has been prepared to assess the rail transport and access issues associated with the SIMTA proposal (Appendix Q). This report includes information on the proposed rail link and rail corridor. The new rail alignment will be designed in accordance with ARTC standards. The final rail alignment will be determined within the detailed design phase in subsequent stages of planning approval. The design has looked at a number of options and opportunities and consultation has been sought, with the relevant authorities and landowners, to achieve the best design outcome. Freight that arrives by rail will be transported to the warehouse and distribution facilities within the SIMTA site, or be directly loaded on to trucks for transport to warehouses and nearby logistics centre. Positioning of the rail spur on the SIMTA site also provides the greatest distance from the residences of Wattle Grove.	Appendix H *Rail Access Report - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
Non-Aboriginal Heritage	Adequacy of the assessment	PS26	Archaeological field studies comprised only over a day and a half. Studies and digs are to be completed before a final EIS is prepared.	An *Aboriginal Cultural Heritage Assessment* has been undertaken for the proposal and is included at Appendix S. Investigation and potential impacts will be assessed in greater detail in subsequent stages of planning approval for both Non-Indigenous and indigenous heritage items. Section 18 of the EA provides a commitment by the proponent for *Undertaking further archaeological assessment and investigation or monitoring, where required in areas designated as having archaeological potential that would be impacted by the proposal. The SoHIs for each stage should address the archaeological potential the development area for each stage.* Section 13.3 of the *Aboriginal Cultural Heritage Assessment* concludes that areas which were not assessed within the SIMTA site are not considered likely to contain Aboriginal objects due to historical disturbance. In addition, Section 6.5.2 of the *Non-Indigenous Heritage Report* recommends that archaeological monitoring should be conducted for a representative sample of the sites former structures. Advice by archaeologists would be provided regarding appropriate further action should any archaeological deposits be encountered. An updated search of the Aboriginal Heritage Information Management Service was undertaken on 13 November 2013, the outcomes of which are discussed in the Submissions report.	Section 18 Appendix S *Aboriginal Cultural Heritage Assessment - Part 3A Concept Application* (AHMS, 2012) Appendix T *Non-Indigenous Heritage - Transitional Part 3A Concept Plan Application* (artefact, June 2012)
Security	Potential for terrorist attack	PS19	There will be a threat of terrorist attack on the Intermodal site including freight and infrastructure. Only 3% of containers are currently checked for illicit and illegal goods. Therefore terrorists may attempt to attach and cripple Sydney's Freight flow, particularly as it seems that the Government is concentrating all of the freight flow into 1 or 2 narrow freight corridors.	The proposal includes security measures to be implemented within the freight village which will manage the site. Further, it has been demonstrated that crime has largely remained stable in the Liverpool Local Government Area (LGA) and that crime rates in Moorebank are generally lower than the wider LGA. In 2009 the Australian Government released the white paper Defending Australia in the Asia Pacific Century: Force 2030 to improve efficiency and effectiveness of Defence. The Defence Logistics Transformation program (DLTP) will include consolidating the Moorebank DLTP site to fewer facilities with a reduced net storage maintenance footprint. The Department of Defence has noted that it is not cost-effective to make significant infrastructure investments on the current lease site. As a result of contracting operations on the DLTP Moorebank Site it is unlikely that the SIMTA proposal will adversely impact Defence operations or National Security.	Section 2.5.2
Security	Study Area	PS19	Crime and statistics have only been included for the suburb of Moorebank, when the intermodal lies closer to the residential areas of Wattle Grove and Casula.	Crime Prevention through Environmental Design principles will be considered in the final design for the site. The proposal includes security facilities within the freight village which will manage the site. Further, it has been demonstrated that crime has largely remained stable in the Liverpool LGA and that crime rates in Moorebank are generally lower than the wider LGA.	Section 2.5.2
Soils and Contamination	Adequacy of the assessment	PS26	The area is largely unexplored (access is difficult due to unexploded devises) making it difficult to adequately assess environmental impacts.	The Proponent will undertake further investigations at subsequent stages of approval. As noted within the Statement of Commitments under Section 18 of the EA, the proponent will undertake a Phase 2 intrusive environmental site assessment in particular, having regard to unexploded ordnance. The Statement of Commitments state that the Proponent would undertake the following: *Developing a Contamination Management Plan with detailed procedures on:* *- Handling, stockpiling and assessing potentially contaminated materials encountered during the development works;* *- Landfill gas management during the excavation, handling, and stockpiling of waste materials, if excavation is required during the development, in the area of the Glenfield Quarry and Landfill;* *- Assessment, classification and disposal of waste in accordance with relevant legislation; and* *- A contingency plan for unexpected contaminated materials, such as materials that is odorous, stained or containing anthropogenic materials, that may be encountered during site works.* *The Proponent will undertake the following tasks in association with the detailed planning applications for the staged redevelopment of the rail corridor lands:* *- Undertaking a Phase 2 intrusive environmental site assessment of the proposed rail corridor lands, with an objective to assess the risk posed to the detailed design and construction of the rail corridor by the areas of environmental concern identified within this report. The Phase 2 intrusive investigation would include a program of soil and groundwater sampling completed in accordance with the guidelines made or approved by the EPA under s 105 of the Contaminated Land Management Act 1997*	Section 18

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Traffic modelling-trucks calculations	PS19	SIMTA say that "there will be an increase in truck movements on the M5, not as a result of the SIMTA proposal but due to: Development within the West and South West Sydney regions [and] an increase in the number of containers expected to be processed through Port Botany (Port Botany is set to reach its planning cap of 3.2 million TEUs)." This statement cannot be correct in consideration of the number of trucks that will be required to use the M5 Motorway to get onto the M7 Motorway.	Changes in truck movements have been assessed in Section 5.3 of the EA and within the *Transport and Accessibility Impact Assessment* Section 8 of the *Transport and Accessibility Impact Assessment* outlines proposed network improvements and infrastructure upgrades. Planned upgrades to the M5 Motorway have been identified and updated in consultation with TfNSW and RMS. By transporting freight by rail from Port Botany to the proposed Moorebank Intermodal Facility the proposal will reduce the number of trucks currently travelling on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site , whereas one truck would likely only be able to transport on average, 2 TEU 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 by 2,735 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.	Section 5 Appendix F *Transport and Accessibility Impact Assessment - Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)
Traffic & Access	Traffic modelling-intersections	PS24	SIMTA modelled 13 intersections. For the future scenario, with only background traffic, ten of the 13 had a Level of Service "F" in either the AM or/and PM peak. It is highly likely, therefore, that other intersection not studied will also be highly congested. An intersection of five intersections within the "Inner Core Model" as an analysis of traffic impacts from the relocation of the equivalent of 1/2 of the current Port Botany's freight traffic to Moorebank, is not an adequate analysis.	The *Transport and Accessibility Impacts 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. It is noted in Section 5.3 of the *Transport and Accessibility Impact Assessment* that future road improvement projects that were used in the base case network were identified from the following key sources, as agreed with the NSW Roads and Maritime Service (RMS): - Sydney Strategic Travel Model (STM), Bureau of Transport Statistics (BTS). - M5 West Widening Project, Environmental Assessment, RTA/RMS, September 2010. - M5 West Widening Project, Preferred Project Report, RTA/RMS, May 2011. - Infrastructure Statement 2010-2011, RTA/RMS. In 2031, once the upgrades are complete, the background traffic growth means that the delays at the intersections modelled is the same as in 2010.	Section 5 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix G *Freight Demand Modelling - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a)
Traffic & Access	Traffic congestion	PS1, PS4, PS7, PS8, PS9, PS10, PS11, PS12, PS14, PS16, PS19, PS20, PS23, PS25, PS26	The proposal identifies current unacceptable traffic congestion at the M5 / Moorebank Rd intersection, the M5 / Hume Highway and some other intersections near the proposed intermodal development. The proposal will result in unacceptable levels of congestion on already highly congested roads. The local road network will experience significantly greater traffic volumes (eg. on Newbridge Road and Anzac Road). The SIMTA proposal suggests postponing the mitigation of these traffic problems for 18 years i.e., until 2031 when the intermodals are operating at full capacity. This is unacceptable.	Section 5.3.1 of the EA discusses the traffic impacts of the SIMTA proposal. Section 5.3 identifies the strategies to mitigate traffic impacts on the surrounding road network. The *Transport and Accessibility Impact Assessment* provides information on the proposed upgrades to the surrounding road network, which are discussed in detail in Section 8.1 of Appendix F. Section 5.5 and 6.10.1 of the *Transport and Accessibility Impact Assessment* provides an analysis of the anticipated Level of Service (LoS) on five intersections within the Core Area Network with, and without the SIMTA proposal respectively. It was identified that in both cases all five intersections have been considered to have poor LoS. Section 8 of this report outlines the required infrastructure upgrades necessary to deliver adequate capacity for the road network until 2031. It is noted that: *The timing of the individual road and intersection capacity improvements will depend on a number of factors, but the prime factor would be the rate of development within the SIMTA site. A staged approach [to the road network upgrades] would be required as development progresses across the site.* It is noted in Section 5.3.1.1 that these road network upgrades would be discussed and negotiated with the relevant transport authorities, and potentially impacted stakeholders. Funding arrangements will be determined in the detailed application for future stages. SIMTA will remain in consultation with all key stakeholders. Load limits and road treatments would be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs) are restricted under the *Roads Transport (Mass Loading and Access) Regulation 2005* and the *Road Transport (Vehicle Registration) Regulation 2007* from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Anzac Road is not mapped as a RAV route; therefore, trucks will not access the site via Anzac Road. The strategic traffic model demonstrates that the proposed M5 West widening would reduce traffic volume on Newbridge Road and Milperra Road. The additional truck activity generated by the SIMTA proposal would be concentrated on key arterial roads such as M5 Motorway, Hume Highway and M7 Motorway. It is recommended to monitor SIMTA truck traffic on key roads as development progress.	Sections 5.3.1.1 and 5.3 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Infrastructure and project cost	PS1, PS3, PS19, PS25, PS26	As a pre-condition of approval it should be mandated that the M5 / Moorebank Road intersection, the M5 / Hume Hwy intersection and the widening of Moorebank Avenue should be completed before the intermodal commences operation. The cost of the rail connection and the road upgrades should be borne by the operators. I have been advised that 13 intersections would have to be reconstructed which would involve a massive expenditure which has not been fully studied.	The *Transport and Accessibility Impact Assessment* identifies the road capacity issues in the current base case and future growth case traffic models and identifies the network improvements required. 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. Input from the community will also be sought.* The *SIMTA Moorebank Intermodal Terminal Economic Assessment* (refer to Appendix X)also notes: *The demands on the M5 are likely to continue to grow, particularly due to the population growth that has been planned for the South West Growth Centres. As such the built capacity of the M5 Motorway will continue to be exceeded, which will further contribute to increasing travel times, congestion and potentially the rate of accidents, all of which contribute to losses in productivity. We note that the RTA is proposing to upgrade the entire section of the M5 South West Motorway to 3 lanes in each direction to help address this capacity issue .* The Economic Assessment notes that the SIMTA proposal will result in a: *Net travel time savings of approximately 530,400 hours per annum, resulting in a labour cost savings to business in the order of $18.6 million per annum ($2011).*	Sections 5.3 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a) Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).
Traffic & Access	Infrastructure and truck loads	PS6, PS13, PS15, PS19, PS26	Trucks will likely use Anzac Road as a shortcut, leading to an increase in heavy vehicle use in the area. It is inevitable that traffic along Anzac Road will be affected by over ten fold when SIMTA is operational. Little has been offered in reality to ensure that no trucks use Anzac Road. Despite supported restrictions, B-doubled frequent Anzac Road 24 hours a day. Assumptions that controls are going to mitigate vehicles from using residential roads is incorrect. In addition, the plan to upgrade Anzac Road to a full 4 lane road indicates that the road will be used by trucks. Even without heavy vehicles, Anzac Road is expected to experience increased traffic as a result of employee trip movements. Details should be provided regarding the infrastructure improvements to Anzac Road and the funding arrangements for these upgrades. Procedures implemented to prevent trucks from using local streets need to be specified. As does how these procedures will be followed through, monitored and carried out, as well as which streets are targeted. The residents who live along Anzac Road would like to have the commitment from SIMTA and the Department of Defence to close the western section of Anzac Road as a measure to stop trucks traffic along this road. Defence was contacted in regards to the option but verbally stated they no longer own Anzac Road and that RMS/Liverpool City Council now owns it. When LCC was contacted, it was stated that Defence owns it.	Load limits and road treatments can be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs) are restricted under the *Roads Transport (Mass Loading and Access) Regulation 2005* and the *Road Transport (Vehicle Registration) Regulation 2007* from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Anzac Road is not mapped as a RAV route; therefore, trucks will not access the site via Anzac Road. Closure of any section of Anzac Road will be a matter of consideration for Liverpool City Council and RMS to address and is not the responsibility of the proponent, nor included in the proposal.	N/A
Traffic & Access	Infrastructure and truck loads	PS19, PS15, PS26, PS14	Despite suggested truck arrival schedules if there is a hold up between Port Botany and Moorebank via the M5 Motorway forcing trucks to queue on nearby roads. Many will leave their engines on leading to diesel emissions. SIMTA EA does not provide any areas for truck drivers to park their vehicles to check review work sheets, rest and eat. If Truck drivers need a break, they have no choice but to park in residential streets. This will create a visual impact and invade the privacy of local residents. There is not enough bitumen to hold the heavy vehicles if the projects eventuate, which could mean they would build tollways which would have to include tunnels, where pollution can multiply up to a thousand times. The off and on ramps allowing access to both eastern and western parts of the M5 motorway are not long enough or large enough to allow for the quantity of trucks that an intermodal will create.	Section 5.3.1 of the EA discusses the traffic impacts of the SIMTA proposal. Section 5.3.4 identifies the strategies to mitigate traffic impacts on the surrounding road network. Section 18 of the EA outlines the proponent's commitment to develop a Traffic Site Management Plan prior to the commencement of operations. This plan will be designed to minimise potential impacts, including: *Management measures to avoid trucks parking and idling either within or outside the site boundaries *Provision of adequate parking for heavy vehicles to accommodate any potential delays in schedule times. In addition, a centralised staff car parking area will be provided adjacent to the ancillary facilities on site, enabling the separation of heavy vehicle movements from private vehicle movements, particularly around the intermodal terminal warehouses. The *Transport and Accessibility Impact Assessment* provides information on the proposed upgrades to the surrounding road network, which are discuss in detail in Section 8.1 of Appendix F to the EA. All road upgrades would be undertaken in accordance with RMS standards and requirements, and would be designed to accommodate heavy vehicles. No tollways or tunnels have been included as part of the SIMTA proposal. The proposed road upgrade works include upgrades to the: *M5 Westbound off-ramp *M5 Westbound on-ramp *M5 eastbound off-ramp	Sections 5.3.1 and 5.3.4 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Public transport	PS24, PS26	The statement "A terminal employee public transport mode share shift of about 30% is considered feasible" is optimistic. At the peak car parking time (between 7:00-9:00am) only 1,765 car parking space will be required, while 1,800 spaces are provided. Furthermore RailCorp data reaffirms that the average load factor (rail seats to passenger ratio) was about 125%, highlighting the unattractiveness of rail transport. Next, Liverpool buses will have to travel through five of the 13 analysed intersections (when 12 of the 13 intersections have a level of Service 'F', that is, intersections with 1 km long queues), meaning bus trips will be slow. Therefore with an oversupply of car park spaces and the unattractiveness of public transport it is unlikely that a 30% mode shift to public transport is feasible.	The *Transport and Accessibility Impact Assessment* identified the travel characteristics of SIMTA employees, taking into account the Census data. This included opportunities to target the development of a public transport plan reducing overall trip lengths, travel times and targeting bus services to the site. The assessment concludes that a 30% mode share shift is considered feasible, taking into account the range of infrastructure and non-infrastructure measures proposed to influence and change travel behaviour over the life of the development. Section 8.4.1 of the *Traffic and Accessibility Impact Assessment* includes a range of initiatives to encourage the use of alternative forms of transport to the private motor vehicle with a sole driver, while recognising the site context and existing/future access to public transport services as the site is developed in a staged manner. It further outlines the potential for additional public transport means, including express bus services between stations, walking and cycleways and extended/additional bus services. These mitigation measures are expected to create a terminal employee public transport mode share of approximately 30%, which is greater than that applying across Liverpool at present. A reduction in the number of car spaces, by 680 spaces, has also been proposed as a means of promoting public transport use. The revised *Rail Access Report* identifies the potential future Moorebank station and the quadruplication of the East Hills Passenger line and provides sketches illustrating how the SIMTA rail link would accommodate these two proposals should they proceed in the future. Operation of the passenger service line is the mandate of Sydney Trains (formerly RailCorp) and the need and appropriateness of this infrastructure will be determined by them in the future.	Section 5.3.3.4 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b).
Traffic & Access	Road safety	PS3, PS15	As the trucking industry is motivated by monetary incentives to perform many trips in the fastest time possible, it is likely that they will not follow the law, in regards to safe speeds and access routes. It is likely that heavy vehicles will use Wattle Grove Drive, Anzac Rd and Moorebank Avenue, the impacts of which have not been assessed. Truck drivers may have an unsocial agenda taking advantage of their cabin height to invade the privacy of residents.	The *Transport and Accessibility Impact Assessment* (Appendix F), includes a discussion on the impacts on crashes and accidents as a result of the proposal. Section 6.12 of Appendix F notes that the SIMTA proposal would not substantially increase the likelihood of crashes/accidents in the longer term. As noted above, trucks accessing the SIMTA site would be bound to follow this legislation, which would restrict them from using roads that have not been prescribed as heavy vehicle access routes. Heavy vehicles (referred to as restricted access vehicles (RAVs)) are restricted under the *Roads Transport (Mass Loading and Access) Regulation 2005* and the *Road Transport (Vehicle Registration) Regulation 2007* from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Anzac Road and Wattle Grove Drive are not mapped as RAV routes; therefore, trucks will not access the site using these roads. Moorebank Avenue is mapped as an RAV route and has been assessed in the *Traffic and Transport Impact Assessment* . Appropriate mitigation measures have been identified to manage potential impacts on this road as a result of the SIMTA proposal.	Section 5.3.1 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix G *Freight Demand Modelling – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013a).
Traffic & Access	Road safety	PS3, PS19, PS20, PS25, PS24	Trucks merging from Moorebank Ave onto the M5 Motorway travelling towards the M7 Motorway will inevitably cause accidents. Not enough information has been provided in SIMTA's EA regarding mitigating or providing solutions for this matter. Upgrades to the networks will not prevent accidents on the M5 Motorway. Who will pay for the costs associated with accidents. 800 metres outside the north edge of the SIMTA "Core Area Model" is Sydney's worst accident hot spot. SIMTA modelling showed that 27% of its freight traffic will travel through Sydney's worst accident hot spot. This area should be included in the traffic impact assessment. The proposal will result in ne truck every 15 seconds through this hot spot.	As noted above, information on crashes and accidents has been included in Section 6.12 of Appendix F. The SIMTA proposal is not expected to substantially increase the likelihood of crashes/accidents in the longer term. Strategic Modelling analysis indicated a low impact as a result of the SIMTA proposal within the 'wider' area for traffic and access where the accident 'hot spot' is located. 21 intersections were assessed, in the *Transport and Accessibility Impact Assessment* , within the 'inner area' for traffic and access, including intersections within Casula, Glenfield and Wattle Grove.	Section 5.3.1 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a).
Traffic & Access	Data requirements	PS24, PS25	Why have statistics regarding travel assumptions, demand input data or resulting network performance indicators not been provided? Traffic modelling has shown that during the PM Peak model 757 vehicles could not enter the 2010 PM network. If the base scenario cannot accommodate it is unlikely that in the future scenario the network capacity will be sufficient for additional traffic. Therefore, how many SIMTA vehicles could not enter the network? How many SIMTA vehicles were modelled? What network improvements were included in the modelling to allow for additional traffic? What are the costs associated with network changes.	Information has been provided within the *Transport and Accessibility Impact Assessment* , including additional modelling, sketch diagrams and the staged delivery of proposed upgrades, including AM peak model data. Assumptions and data used in the modelling are provided in Appendix F. These assumptions have been reviewed by the RMS. Traffic generation calculations for the SIMTA proposal that were included in the traffic modelling are detailed in *Technical Note 3 – Traffic Generation* (Appendix D to the *Transport and Accessibility Impact Assessment*). The *Transport and Accessibility Impact Assessment* acknowledges that: *The regional and local road network will need to be developed progressively over the next 20 years to cater for the forecast increase in traffic volumes which will result from both the SIMTA development and the general growth in traffic passing through the core study area. The analysis identified the road capacity improvements required to cater for the additional traffic demands.*	Section 5.3 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Traffic & Access	Truck (TEU) numbers	PS19, PS24, PS25, PS26	Governments proposal is inaccurate. This is evidenced as SIMTA would not make enough money for its stakeholders and shareholders if it were to process only half a million TEU per year. TfNSW considered that the intermodal will generate approximately 20,700 daily truck movements, which is ten times the truck generation estimated for the SIMTA proposal. This has not been considered in the calculations with the EA. In addition this estimate could be too low as it does not reflect all the induced traffic associated with the warehousing within SIMTA. If the Intermodal is approved the traffic could be 4 times that of what is currently generated at Port Botany, and be similar to traffic volumes on the Sydney Harbour Bridge. Traffic estimates are too low for the Sydney road networks, including to and from: Camellia (80,00 TEU. Closed, but for how long?), Chullora (300,00 TEU), Leightonfield (80,000 TEU), Minto (150,000 TEU), Yennora (170, 000 TEU). When these are added together, to the Port Botany TEU of 2 mil, there will be a total of 2.2million TEU - not the 1 million TEU modelled by SIMTA. The additional 1.2 million will then double if the commonwealth intermodal goes ahead. No data has been provided of the vehicle numbers used in the modelling work. Notably, were the vehicle numbers equivalent of 1 million TEUs (including going two and from the site) or just the 500,000 TEUs going to. Many containers entering Port Botany could have multiple consignments, which makes it virtually impossible to estimate the number of diesel trucks that would be needed to distribute the consignments to their final destination.	A *Freight Demand Modelling* report has been included in Appendix G of the EA to further clarify the intended freight catchment of the SIMTA proposal and includes further details on the method used to determine the freight demand and subsequent traffic movements. The report includes the latest freight data available from Port Botany, which demonstrates that, based on Sydney Ports Corporation (SPC) planning assumptions, trade throughput at the Port would reach 4.7 million TEU by 2025. The *Transport and Accessibility Impact Assessment* includes a comprehensive breakdown of the method of calculation used to derive the estimated 2,638 truck movements generated by the site operations (Appendix D to the *Transport and Accessibility Impact Assessment*). SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the report reflects the outcomes of this negotiation.	Sections 3.3.2 and 5.3 Appendix F *Transport and Accessibility Impact Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, August 2013a). Appendix G *Freight Demand Modelling – Transitional Part 3A Concept Plan Application (* Hyder Consulting, June 2013a).
Traffic & Access	Infrastructure and truck loads	PS14, PS19	Trucks may well be taken off the M5 Motorway near Botany but they will just be placed at Moorebank. The proposal will not remove trucks from the roads but only relocate them and cause major traffic problems in the area	By transporting freight by rail from Port Botany to the Moorebank Intermodal Facility the proposal will reduce the number of trucks on the road. One train can transport up to 91 TEU from Port Botany to the intermodal site , whereas one truck would likely only be able to transport on average, 2 TEU per trip (refer to Section 6.6.2 of *Transport and Accessibility Impact Assessment (* it is noted that the *Traffic and Accessibility Impact Assessment* report conservatively adopted an average truck transport of 1.6 TEU). The resulting reduction in congestion and heavy vehicle movements along the M5 Motorway between Port Botany and Moorebank is expected to be 2,735 vehicles per day. SIMTA have worked with TfNSW and the RMS to confirm and validate the predicted traffic volumes and the *Transport and Accessibility Impact Assessment* reflects the outcomes of these discussions. Section 5 of the *Greenhouse Gas Assessment* demonstrates how the Moorebank facility will improve freight transport efficiency within the Moorebank freight catchment. Traffic projection 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.	Section 5.3 Appendix F *Transport and Accessibility Impact Assessment - Part 3A Concept Plan Application* (Hyder Consulting, August 2013a) Appendix R *Greenhouse Gas Assessment - Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013h).
Traffic & Access	Rail spur congestion	PS12	Without a dedicated freight line from Botany to Macarthur the system will be slow, and will be unable to achieve the predicted 40% movement of containers by rail.	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 a future whole or precinct access arrangement, with he MICL site also being able to access through the same connection point. Recent discussion with ARTC indicated that they have a designated train path model showing that there are 24 train paths available each way. At its peak, the SIMTA proposal will require 21-22 paths. As the SIMTA proposal has the durability to service the entire precinct, the impact on the SSFL would therefore be limited. It was concluded, however that further capacity reviews were required by ARTC and the project team as the SIMTA proposal progressed. Additional infrastructure on the main line may be required. This would be staged depending on ARTC's corridor capacity strategy development that would take into account all users between Port Botany and Moorebank.	Section 5.3 Appendix H *Rail Access Report- Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
Traffic & Access	Street pollution	PS15	Trucks with unsecured loads will increase debris and littering of residential streets.	Load limits and road treatments can be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs)) are restricted under the *Roads Transport (Mass Loading and Access) Regulation 2005* and the *Road Transport (Vehicle Registration) Regulation 2007* from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Trucks, will therefore not access the SIMTA site via residential streets. In addition, the *Road Transport (Mass Loading and Access) Regulation 2005* stipulates that 'A load on a vehicle or a trailer must be secured so that it is unlikely to be dislodged from the vehicle'.	N/A
Visual impact	Infrastructure and truck loads	PS15	Increased trucks will have a visual impact, as they are large, unsightly and the height of heavy vehicles stands taller than your average six foot fence.	Load limits and road treatments can be implemented to restrict/prevent use of residential roads by trucks. Heavy vehicles (referred to as restricted access vehicles (RAVs)) are restricted under the *Roads Transport (Mass Loading and Access) Regulation 2005* and the *Road Transport (Vehicle Registration) Regulation 2007* from using roads outside of the routes identified on RMS RAV maps. Trucks accessing the SIMTA site would be bound to follow this legislation, preventing 'rat running' and restricting them from using roads that have not been prescribed as heavy vehicle access routes. Trucks, will therefore not access the SIMTA site via residential streets, minimising visual impacts from trucks within residential areas. The Visual Impact Assessment comprehensively analyses the likely visual impacts as a result of the SIMTA proposal from key vantage points, and outlines proposed management/mitigation measures. Visual impacts are addressed in Section 13.3.1 of the EA.	Section 13.3.1 Appendix U *Visual Impact Assessment - Transitional Part 3A Concept Application* (Reid Campbell, June 2013b)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Strategic justification		GWS	The proposal is consistent with the NSW Government strategic planning and transport policies which aims to increase the proportion of container freight being moved by rail from Port Botany to 28%.	SIMTA thanks Glenfield Waste Services for their support of the proposal and acknowledges the discussed benefits. The EA is consistent with this comment as outlined in the Section 3.5 "Consistency with State and Commonwealth Policies" and the *Freight Demand Modelling* (Appendix G). There has been strong and consistent policy support at both Commonwealth and State level for the expansion of the rail freight network across NSW. In particular, the development of an intermodal terminal facility at Moorebank has been proposed since 2004. The Concept Plan application lodged by SIMTA will facilitate the timely development of this facility by the private sector as identified within existing and draft strategic planning policy including Railing Port Botany's Containers, Draft National Ports Strategy, National Land Freight Strategy Discussion Paper and Draft NSW Freight and Ports Strategy. Thus, the proposal is entirely consistent with strategic planning and transport policies as it will make a significant contribution to the key freight objectives of the NSW government Draft NSW Freight and Ports Strategy. to increase the proportion of container freight being moved by rail from Port Botany to 28%.	Section 3 Appendix G *Freight Demand Modelling-Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013 a)
Traffic & Access	Rail Spur	GWS	The proposed rail link to the SIMTA site is suitable to support a 'whole-of-precinct approach', with both the SIMTA site and the Moorebank Intermodal Company Limited (MICL) site capable of using the same connection point to the Southern Sydney Freight Line (SSFL).	Agreed. The EA is consistent with this approach as acknowledged within the *Rail Access Report* (Appendix H), which includes information on the proposed rail link and rail corridor. The design looked at a number of options and opportunities and consultation has been sought, with the relevant authorities and landowners, to achieve the best design outcome. As noted in Section 5.3.5 of the EA, the proposed rail link is considered suitable to support a 'whole of precinct approach' with both the SIMTA site and the MICL site. As noted in the Glenfield Waste Services submission, the SIMTA rail link proposed would provide a number of benefits over the MICL proposal link, should it be adopted as the sole link to a precinct concept.	Section 5.3.5 Appendix H *Rail Access Report – Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
Economic Analysis / Justification	Economic and social benefits	GWS	Creation of 850 direct and indirect jobs per annum over the six year construction period, 2,840 jobs during the operational stage when the terminal reaches a throughput capacity of one million TEU (twenty-foot equivalent units) per annum, with a further 4,260 jobs generated indirectly once the facility is fully operational;	Agreed. This is acknowledged in the *Economic Assessment* (Appendix X), which outlines the proposals potential to generate 760,000 new jobs for the Sydney Metropolitan Area. As noted, the SIMTA Intermodal Terminal will deliver approximately 2,840 jobs during the operational stage when the terminal reaches a throughput capacity of one million TEU per annum, with a further 4,260 jobs generated indirectly. These jobs will be a significant contribution to the targets established in State and Commonwealth plans and policies (outlined in section 3.5 of the Environmental Assessment) and include the following: - NSW 2021: A Plan to Make NSW Number One: the proposal will contribute to the 100,000 new jobs target established in this plan with an average growth of 1.25% per year. - Sydney Metropolitan Plan 2036: this plan has established a target of 760,000 new jobs, with half planned for Western Sydney focusing on cities and centres. - Draft Metropolitan Strategy for Sydney to 2031: the proposal will contribute to the delivery of jobs within West and South West Sydney, complying with the aims and objectives of this strategy.	Sections 3.5 and 15.3 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)
Economic Analysis / Justification	Economic and social benefits	GWS	A reduction in net travel time and labour cost savings;	Agreed. Net travel impacts and labour cost are economic benefits associated with the proposal as identified in Appendix X and Section 15.3 of the EA. Net travel time savings of approximately 530,400 hours per annum, with associated labour cost savings of $18.6 million per annum have been estimated as a result of the reduction in truck vehicle kilometres travelled, i.e. approximately 13 million kilometres per annum. Moreover, as outlined in Appendix X, it has been estimated that over a 20 year period, this could generate savings with a net present value in the order of $213 million (based on a 6% discount rate on an un-escalated basis).	Section 15.3 Appendix X *SIMTA Moorebank Intermodal Terminal Economic Assessment* (Urbis, June 2013a)
Economic Analysis / Justification	Economic and social benefits	GWS	The SIMTA Project will create a facility that will attract industrial and business development to Moorebank. It will be a catalyst for land use development that will complement, and not compete with, the employment role of the Liverpool CBD. It will also provide a concentrated freight and logistics employment hub, thus providing key employment opportunities for the surrounding residential community, and accordingly promote close to home work opportunities.	Agreed. As acknowledged in Section 2.4.8 of the EA, the proposal satisfies the Liverpool Development Control Plan 2008 as it would deliver an Intermodal Terminal Facility which will act as a keystone for attracting industrial and business development to the Moorebank Defence Lands, utilising advanced state-of-the-art intermodal gantry and terminal operations. As noted in the Glenfield Waste Services submission the proposal will attract land uses which will complement, and not compete with, the employment role of the Liverpool CBD. Further, the proposal will provide a concentrated freight and logistics employment hub, which will provide key employment opportunities for the surrounding residential community, and accordingly promote close to home work opportunities.	Section 2.4
Traffic & Access	Traffic modelling	GWS	Reducing congestion and heavy vehicle movement along the M5 Motorway between Port Botany and Moorebank by 2,375 vehicles per day.	As noted in the Glenfield Waste Services submission, the modelling analysis suggests that the operation of SIMTA at Moorebank would have the potential to reduce the volumes of heavy vehicles movements along the M5 Motorway corridor in the order of 2,700 (rather than the stated 2,375) movements per day between Port Botany and Moorebank. As acknowledged in Section 3.6 of the EA the proposal is consistent with the objectives identified within Section 1.2 EA. The *Freight Demand Modelling* report has demonstrated that there is a clear benefit arising from the proposal, having regard to its strategic contribution to the development of Sydney intermodal network and its one million TEU annual capacity throughput at the ultimate stage of the development.	Section 3.6 Appendix G *Freight Demand Modelling-Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013 a)

Discipline	Aspect	Submission (s)	Issue	Clarification/Response	EA Section/Specialist Study Reference
Biodiversity	Site rehabilitation	GWS	Rehabilitation and regeneration of degraded areas of vegetation to improve the overall biodiversity quality of the land comprising the rail corridor	Agreed. Comprehensive biodiversity assessment has been undertaken to determine the potential impacts arising from the proposal, including the rail corridor. The outcomes of this assessment are discussed in detail within Section 7 of the EA. As noted by Glenfield Waste Services, the *Flora and Fauna Assessment* (Appendix J1) identified mitigation measures that will be implemented to ameliorate impacts on biodiversity values. Further, the Flora and Fauna Assessment recommended the revegetation of the riparian corridor to restore and/or maintain ecological, functional and habitat values and impede surface flows and drop sediment before it reaches the waterways. As riparian vegetation along both Anzac Creek and Georges River is currently highly degraded, the aim would be to improve the condition through the selection of local provenance species.	Section 7 Appendix J1 *Flora and Fauna Assessment – Impact Assessment Report* (Hyder Consulting 2013 b)
Air Quality	Air pollution	GWS	Reducing congestion and heavy vehicle movement along the M5 Motorway between Port Botany and Moorebank by 2,375 vehicles per day. This will result in a positive impact on regional air quality from an overall net reduction in emissions for NOx and PM.	Agreed. As explained in the EA (Section 1.2) a key objective of the proposal is to assist with alleviating freight-related road congestion between Port Botany and Moorebank, particularly along the M5 Motorway. This objective is consistent with the NSW Government Draft NSW Freight and Ports Strategy objective of achieving 28% of all freight movements being by rail and outlined in Section 3.5 of the EA. As recognised by Glenfield Waste Services and explained in the *Air Quality Assessment* (Appendix Q), the regional impacts of the SIMTA proposal are expected to result in a net reduction in emissions for NOx and PM. The changes in emissions when considered at the regional level and impacts on regional air quality would be negligible.	Sections 1.2 and 3.5. Appendix Q *Air Quality Impact Assessment – Impact Assessment Report* (Pacific Environment, 2013) Appendix R *Greenhouse Gas Assessment-Transitional Part 3A Concept Application* (Hyder Consulting, August 2013h)
Greenhouse Gas	GHG emissions	GWS	The Greenhouse Gas Assessment has demonstrated that the SIMTA proposal can achieve an annual GHG saving of 43,206 tCO2e per annum through improved transport and operational efficiency	Agreed. The *Greenhouse Gas (GHG) Assessment* (Appendix R) sought to compare the proposal with the potential redevelopment of the site in accordance with the Liverpool Local Environmental Plan 2008. This comparison demonstrated that the proposal can achieve an annual GHG saving of 43,206 tCO2e per annum through its operational and transport efficiencies. As outlined in Section 11.3.2 of the EA, the proposal is anticipated to reduce the amount of road traffic within the local Moorebank area and the surrounding region, with an associated reduction in transport related emissions, as a result of a modal shift to a more efficient rail transport, estimated at 40,820 tCO2e.	Section 11.3.2 Appendix R *Greenhouse Gas Assessment-Environmental Assessment Transitional Part 3A Concept Application* (Hyder Consulting, August 2013h)
Urban Design / Site layout	Rail and bridge location	GWS	The use of the existing Rail corridor and East Hills railway line bridge crossing is considered to be the most appropriate location for the proposed use having regard to the opportunities to reduce the potential cumulative impacts. The proposed location of the bridge associated with the SIMTA proposal would prevent the requirement for either a level crossing or overhead crossing at Moorebank Avenue, thus making it an ideal opportunity to use existing infrastructure and minimise on costs	Agreed. Based on the findings of the EA of the key issues outlined in Sections 4-15, an indicative rail alignment has been included in the Concept Plan (Appendix D2). As Glenfield Waste Services acknowledges, the Concept Plan includes a nominated rail corridor which is proposed to accommodate a rail link 20 metres and variable in width to connect the SIMTA site with the Southern Sydney Freight Line via the East Hills Railway Corridor and Commonwealth owned and privately owned land. As explained in *Rail Access Report* (Appendix H) the location of the indicative rail link provides a potential rail alignment within the rail corridor land avoiding cumulative impacts.	Section 4-15 Appendix D2 *Concept Plan- Land Uses* Appendix H *Rail Access Report – Environmental Assessment Transitional Part 3A Concept Plan Application* (Hyder Consulting, June 2013b)
General	Adequacy of the EIS	GWS	Environmental Assessment has provided a comprehensive report that gives consideration to all required aspects of the proposal, as well as the adjoining development, including the MICL proposal for the redevelopment of the School of Military Engineering (SME) site. The assessment provides evidence that the development proposed in the concept Plan application is in the public interest, both from an economic and environmental perspective	Agreed. SIMTA has undertaken a considerable environmental investigation to ensure the thoroughness of the EA. This results in an EA that gives consideration to all potential environmental, social and economic impacts from the Concept Plan approval of the proposal.	All sections